

**EXHIBIT B**

**Certification of John R. Castellano  
in Support of Application for Retention of AlixPartners**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

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(Admitted *pro hac vice*)

*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**CERTIFICATION OF JOHN R. CASTELLANO IN SUPPORT OF  
APPLICATION FOR RETENTION OF ALIXPARTNERS, LLP AS  
FINANCIAL ADVISOR FOR THE DEBTOR EFFECTIVE AS OF THE PETITION DATE**

I, JOHN R. CASTELLANO, being of full age, certify as follows:

1. AlixPartners, LLP (“AlixPartners”) is seeking authorization to be retained as financial advisor for the above-captioned debtor (the “Debtor” or “LTL Management”) in this Chapter 11 Case and make this certification in support of the *Application for Retention of AlixPartners, LLP as Financial Advisor for the Debtor Effective as of the Petition Date* filed by the Debtor (the “Application”).<sup>2</sup>

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> Capitalized terms used herein but not defined shall have the meaning given to such terms in the Application.

2. AlixPartners' and my professional credentials include that AlixPartners' professionals and I have assisted, advised, and provided strategic advice to debtors, creditors, bondholders, investors, and other entities in numerous chapter 11 cases of similar size and complexity to the Debtor's Chapter 11 Case. AlixPartners has provided financial or crisis management services in numerous large cases, including: Core Scientific, Inc., Clovis Oncology, Inc., FTX Trading Ltd., Phoenix Services Topco, LLC, Kabbage Inc. d/b/a KServicing, Lumileds Holding B.V., Carestream Health, Inc., MD Helicopters, Inc., Carlson Travel Inc., LTJ Management LLC, Basic Energy Services, Inc., Alpha Latam Management, LLC, Nine Point Energy, LLC, Grupo Aeromexico S.A.B. de C.V., and Purdue Pharma L.P.
3. I am a Partner and Managing Director of AlixPartners.
4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

AlixPartners' decision to accept this engagement to provide services to the Debtor is conditioned upon its ability to be retained in accordance with its customary terms and conditions of employment, compensated for its services, and reimbursed for the out-of-pocket expenses it incurs in accordance with its customary billing practices, as set forth in Schedule 1 of the Engagement Letter (the "Fee and Expense Structure").

AlixPartners' current standard hourly rates, subject to periodic adjustments, are as follows:

Title	Hourly Rate
Managing Director	\$1,140 – \$1,400
Partner	\$1,115
Director	\$880 – \$1,070
Senior Vice President	\$735 – \$860
Vice President	\$585 – \$725
Consultant	\$215 – \$565
Paraprofessional	\$360 – \$380

AlixPartners generally changes its rates semi-annually. AlixPartners will provide notice of any rate increases consistent with the Prior Retention Order, as set forth in the proposed order filed with this Application.

To the extent that AlixPartners requires services of its international divisions or personnel from specialized practices, the standard hourly rates for that international division or specialized practice will apply.

In addition to compensation for professional services rendered by AlixPartners Personnel, AlixPartners will seek reimbursement for reasonable, necessary, and documented out-of-pocket expenses incurred in connection with this Chapter 11 Case, including transportation costs, lodging, and meals.

To the extent AlixPartners requires services of its international divisions or personnel from specialized practices, the standard hourly rates for that international division or specialized practice will apply.<sup>3</sup>

The Debtor understands that AlixPartners intends to apply for compensation for services rendered and reimbursement of expenses incurred in connection with this Chapter 11 Case, subject to the Court's approval and in compliance with the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (Appendix A to 28 C.F.R. § 58), applicable provisions of the Bankruptcy Code, including sections 330 and 331, the Bankruptcy Rules, the Local Rules, and any other further orders of the Court, including any order establishing procedures for interim compensation an reimbursement of expenses of retained professionals (any such order, any "Interim Compensation Order"), both in connection with this application and the interim and final fee applications to be filed by AlixPartners in this Chapter 11 Case.

AlixPartners will maintain records in support of any fees (in 1/10th of an hour increments), costs, and expenses incurred in connection with services rendered in this Chapter 11 Case. Records will be arranged by category and nature of the services rendered and will include reasonably detailed descriptions of those services provided on behalf of the Debtor. AlixPartners' applications for compensation of fees and reimbursement of expenses will be paid by the Debtor pursuant to the terms of the Engagement Letter and any procedures established by the Court, pursuant to an interim compensation order or otherwise.

AlixPartners often works for compensation that includes hourly-based fees and performance-based, contingent-incentive compensation earned upon achieving meaningful results. AlixPartners is not seeking a success fee in connection with this Chapter 11 Case.

The Engagement Letter contains standard indemnification language with respect to AlixPartners' services including, without limitation, an agreement by the Debtor to indemnify AlixPartners and its affiliates, partners, directors, officers, employees and agents (each, an "AlixPartners Party") from and against all claims, liabilities, losses, expenses and damages arising out of or in connection with the engagement of AlixPartners that is the subject of the Engagement Letter, except for those finally determined or otherwise agreed by the parties to be the direct result of the gross negligence, bad faith, willful misconduct or fraud of any AlixPartners Party.

The Engagement Letter also contains a limitation of liability provision (the "Limitation of Liability Provision") that limits the liability of AlixPartners for direct damages to two times the amount of fees paid with respect to services performed under the Engagement Letter.

The Debtor and AlixPartners believe that the indemnification provisions contained in the Engagement Letter (the "Indemnification Provisions") and the Limitation of Liability Provision are

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<sup>3</sup> Consistent with the Prior Retention Order, to the extent AlixPartners uses the services of independent contractors (the "Contractors") in the Chapter 11 Case, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtor at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs incurred; (c) require the Contractors to file Rule 2014 affidavits indicating that the Contractors have reviewed the potential parties in interest list in this Chapter 11 Case received from the Debtor and/or its representatives (each party a "Party in Interest", and collectively the "Parties in Interest List") in this case, disclose the Contractors' relationships, if any, with Parties in Interest List and indicate that the Contractors are disinterested; (d) confirm that the Contractors remain disinterested during the time that AlixPartners is involved in providing services to the Debtor; (e) require the Contractors to represent that they will not work for the Debtor or other parties-in-interest in this case during the time AlixPartners is involved in providing services to the Debtor; and (f) attach any such Contractor invoices to its monthly fee statements, interim fee applications and/or final fee applications filed in this case.

customary and reasonable for AlixPartners and comparable firms providing financial advisory services.

The terms and conditions of the Indemnification Provisions and the Limitation of Liability Provision were negotiated by the Debtor and AlixPartners at arm's length and in good faith. The provisions contained in the Engagement Letter, viewed in conjunction with the other terms of AlixPartners' proposed retention, are reasonable and in the best interest of the Debtor, its estate, and all parties in interest in light of the fact that the Debtor requires AlixPartners' services to successfully reorganize. Nonetheless, AlixPartners has agreed that the Indemnification Provisions shall be subject to the same terms contained in the Prior Retention Order and that the Limitation of Liability Provisions shall have no force or effect during the pendency of this Chapter 11 Case.

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: See no. 6 below.

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe Connection:

In connection with its proposed retention by the Debtor in this Chapter 11 Case, AlixPartners undertook a complex process, the details of which are set forth in Schedule 2, to determine whether it had any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtor's estate. Specifically, AlixPartners obtained from the Debtor and/or its representatives a potential parties in interest list in this Chapter 11 Case (each party a "Party in Interest", and collectively the "Parties in Interest List"). The Parties in Interest List is attached hereto as Schedule 1.<sup>4</sup> A search was performed for connections to each Party in Interest as to AlixPartners Holdings, LLP, AlixPartners' parent company ("Holdings"), and each of Holdings' U.S. and non-U.S. subsidiaries ("Holdings Enterprise", collectively "AP"). Results for connections to the Parties in Interest List are disclosed on Schedule 2.

Based on that review, AlixPartners represents that, to the best of its knowledge, AlixPartners knows of no fact or situation that would represent a conflict of interest, cause it not to be disinterested or hold or represent an interest adverse to the Debtor's estate.

AlixPartners and its affiliates are advisors and crisis managers providing services and advice in many areas, including restructuring and distressed debt. As part of its diverse practice, AlixPartners appears in numerous cases, proceedings, and transactions involving many different law firms,

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<sup>4</sup> Schedule 1 includes the Parties in Interest List prepared as of April 26, 2023.

accountants, investment bankers, and financial consultants, some of whom may represent claimants and parties in interest in this Chapter 11 Case. Further, AlixPartners has in the past, and may in the future, be represented by various attorneys and law firms, some of whom may be involved in this Chapter 11 Case. In addition, AlixPartners has been in the past, and likely will be in the future, engaged in matters unrelated to the Debtor or this Chapter 11 Case in which it works with or in opposition to other professionals involved in this Chapter 11 Case. Moreover, AlixPartners might have referred work to other professionals retained in this Chapter 11 Case. Likewise, professionals retained in this Chapter 11 Case might have referred work to AlixPartners. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, none of these business relationships constitute interests adverse to the Debtor.

From time to time, AlixPartners has provided services, and likely will continue to provide services, to certain creditors of the Debtor and various other parties adverse to the Debtor in matters wholly unrelated to this Chapter 11 Case. As described herein, however, AlixPartners has undertaken a detailed search to determine, and to disclose, whether it is providing or has provided services to any significant creditor, equity holder, insider, or other party-in-interest in such unrelated matters.

To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, none of the AlixPartners' personnel (a) have any connection with the Court and employees in the Office of the Court and (b) bankruptcy judges for the District of New Jersey, except as otherwise set forth Schedule 2.

To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, AlixPartners has not been retained to assist any entity or person other than the Debtor on matters relating to, or in direct connection with, this Chapter 11 Case. AlixPartners will continue to provide professional services to entities that may be creditors or equity holders of the Debtor or other parties in interest in this Chapter 11 Case, provided that such services do not relate to, or have any direct connection with, this Chapter 11 Case.

Certain of AlixPartners' employees, managing directors, board members, equity holders, or an affiliate of any of the foregoing may have financial accounts or insurance relationships with a potential party in interest.

Despite the efforts described above to identify and disclose the connections that AlixPartners and its affiliates have with parties in interest in this Chapter 11 Case, because the Debtor is a large enterprise with numerous creditors and other relationships, AlixPartners is unable to state with certainty that every client relationship or other connection has been identified and disclosed.

In accordance with section 504 of the Bankruptcy Code and Bankruptcy Rule 2016, neither I nor AlixPartners has entered into any agreements, express or implied, with any other party in interest, including the Debtor, any creditor, or any attorney for such party in interest in this Chapter 11 Case, (a) for the purpose of sharing or fixing fees or other compensation to be paid to any such party in interest or its attorneys for services rendered in connection therewith, (b) for payment of such compensation from the assets of the estate in excess of the compensation allowed by the Court pursuant to the applicable provisions of the Bankruptcy Code, or (c) for payment of compensation in connection with this Chapter 11 Case other than in accordance with the applicable provisions of the Bankruptcy Code.

Accordingly, except as otherwise set forth herein, insofar as I have been able to determine, neither I, AlixPartners, nor any AlixPartners' Personnel holds or represents any interest adverse to the Debtor or its estate, and AlixPartners is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, in that AlixPartners and its professionals and employees who will work on the engagement:

- (a) are not creditors, equity holders, or insiders of the Debtor;

- (b) were not, within two years before the Petition Date, a director, officer or employee of the Debtor; and
- (c) do not have an interest materially adverse to the interest of the Debtor's estate or any class of creditors or equity holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

If AlixPartners discovers additional information that requires disclosure, AlixPartners will promptly file a supplemental disclosure with the Court as required by Bankruptcy Rule 2014. AlixPartners reserves the right to supplement this Declaration in the event that AlixPartners discovers any facts bearing on matters described in this Declaration regarding AlixPartners' employment by the Debtor.

With regards to compensation prior to the Petition Date, the Debtor paid AlixPartners for its services in connection with the 2021 Chapter 11 Case pursuant to the interim compensation order entered in that case throughout the pendency of the 2021 Chapter 11 Case.

On April 4, 2023, following the entry of the Dismissal Order and prior to the commencement of this Chapter 11 Case, AlixPartners received payment from the Debtor of all unpaid actual and estimated fees incurred through the commencement of this Chapter 11 Case.

In particular, following the entry of the Dismissal Order, on April 4, 2023, the Debtor paid AlixPartners \$148,069.70 via wire transfer (the "Payment"). This amount comprises of (a) \$118,069.70 on account of actual and estimated fees and expenses incurred but not yet paid in the 2021 Chapter 11 Case through the entry of the Dismissal Order (the "Pre-Dismissal Amounts"), and (b) \$30,000.00 for AlixPartners's estimated fees and expenses incurred following dismissal of the 2021 Chapter 11 Case and prior to the commencement of this Chapter 11 Case (the "Post-Dismissal Amounts"). The Payment was applied to the Pre-Dismissal Amounts and the Post-Dismissal Amounts prior to the commencement of this Chapter 11 Case. Accordingly, as of the Petition Date, AlixPartners was not owed any amounts by the Debtor.

This payment to AlixPartners was made in accordance with the terms of the Dismissal Order, which provides that a Retained Professional (as defined therein) may "seek final allowance and payment of compensation and reimbursement of expenses" in accordance with the procedures set forth in the Dismissal Order, which procedures included serving "a statement of all of its unpaid fees and expenses incurred in [the 2021] Chapter 11 Case through the Dismissal Date" on the Debtor "no later than 45 days following the Dismissal Date." Dismissal Order, ¶ 5. AlixPartners served such a statement on the Debtor.<sup>5</sup>

In addition, the Debtor was solvent at the time it made this payment to AlixPartners. See LTL, 64 F.4th at 108 ("LTL, at the time of its filing, was highly solvent with access to cash to meet comfortably its liabilities as they came due for the foreseeable future."); see also Apr. 18, 2023 Hr'g Tr. 62:21-25 (the Debtor's chief legal officer testifying that Johnson & Johnson Holdco (NA) Inc. ("Holdco"), the party to the funding agreement with the Debtor, is valued at around \$30 billion); id. at 207:3-4 (counsel for the Debtor reiterating that the value of Holdco is \$30 billion).

After the Petition Date, AlixPartners reconciled the Payment made with respect to Pre-Dismissal Amounts and the Post-Dismissal Amounts. Following such reconciliation, AlixPartners holds a retainer (the "Retainer") in the total amount of \$35,215.00. AlixPartners will apply this Retainer

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<sup>5</sup> On April 26, 2023, the Debtor filed a motion for authorization to satisfy the fees and expenses of the other estate professionals involved in the 2021 Chapter 11 Case per the terms of the Dismissal Order. See Dkt. 319.

to fees and expenses incurred from and after the Petition Date consistent with the terms of any Interim Compensation Order, but AlixPartners will not apply any portion of the Retainer unless and until authorized to do so by a further order of this Court, including any Interim Compensation Order.

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

☒ do not hold an adverse interest to the estate.

☒ do not represent an adverse interest to the estate.

☒ are disinterested under 11 U.S.C. § 101(14).

☐ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

☐ Other. Explain:

8. If the professional is an auctioneer,

a. The following are my qualifications and experience with the liquidation or sale of similar property: N/A

b. The proposed method of calculation of my compensation, including rates and formulas, is: N/A

Pursuant to D.N.J. 2014-2, I ☐ do or ☐ do not request a waiver of the requirements of D. N. J. LBR 2016-1.

c. The following is an estimate of all costs and expenses, including labor, security, advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: N/A

d. Have you, or a principal of your firm, been convicted of a criminal offense?  
☐ No ☐ Yes (explain below) ☒ N/A

e. I certify that a surety bond as described in D. N. J. LBR 2014-2(a)(6) is in effect and will remain so through the date of turnover of the auction proceeds. N/A

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

I certify under penalty of perjury that the above information is true.

Date: May 4, 2023

/s/ John R. Castellano  
John R. Castellano



**SCHEDULE 1**

**Schedule of Potentially Interested Parties**

**LTL Management LLC**  
**Potentially Interested Parties**

**Debtor**

LTL Management LLC

**Direct Equity Owner of Debtor**

Johnson & Johnson Holdco (NA) Inc.

**Debtor's Direct Non-Debtor Subsidiary**

Royalty A&M LLC

**Other Non-Debtor Affiliates**

3Dintegrated ApS  
ABD Holding Company, Inc.  
ABIOMED R&D, Inc.  
ABIOMED, Inc.  
Acclarent, Inc.  
Actelion Ltd  
Actelion Pharmaceuticals Ltd  
Actelion Pharmaceuticals Trading  
(Shanghai) Co., Ltd.  
Actelion Pharmaceuticals US, Inc.  
Actelion Treasury Unlimited Company  
Albany Street LLC  
ALZA Corporation  
Alza Land Management, Inc.  
AMO (Hangzhou) Co., Ltd.  
AMO (Shanghai) Medical Devices  
Trading Co., Ltd.  
AMO ASIA LIMITED  
AMO Australia Pty Limited  
AMO Canada Company  
AMO Denmark ApS  
AMO Development, LLC  
AMO France  
AMO Germany GmbH  
AMO Groningen B.V.  
AMO International Holdings  
Unlimited Company  
AMO Ireland  
AMO Italy SRL  
AMO Japan K.K.  
AMO Manufacturing USA, LLC  
AMO Netherlands BV  
AMO Nominee Holdings, LLC

AMO Norway AS  
AMO Puerto Rico Manufacturing, Inc.  
AMO Sales and Service, Inc.  
AMO Singapore Pte. Ltd.  
AMO Spain Holdings, LLC  
AMO Switzerland GmbH  
AMO United Kingdom, Ltd.  
AMO Uppsala AB  
Anakuria Therapeutics, Inc.  
AorTx, Inc.  
Apsis SAS  
Aragon Pharmaceuticals, Inc.  
Asia Pacific Holdings, LLC  
Atrionix, Inc.  
AUB Holdings LLC  
Auris Health, Inc.  
Backsvalan 6 Handelsbolag  
Beijing Dabao Cosmetics Co., Ltd.  
BeneVir BioPharm, Inc.  
Berna Rhein B.V.  
BioMedical Enterprises, Inc.  
Biosense Webster (Israel) Ltd.  
Biosense Webster, Inc.  
Breathe, Inc.  
C Consumer Products Denmark ApS, n/k/a  
Coloplast Konsumerntvarer A/S  
Carlo Erba OTC S.r.l.  
Centocor Biologics, LLC  
Centocor Research & Development, Inc.  
Cerenovus, Inc.  
ChromaGenics B.V.  
Ci:z. Labo Co., Ltd.  
Cilag AG  
Cilag GmbH International  
Cilag Holding AG  
Cilag Holding Treasury Unlimited Company  
Cilag-Biotech, S.L.  
Coherex Medical, Inc.  
ColBar LifeScience Ltd.  
Consumer Test Entity  
Cordis de Mexico, S.A. de C.V.  
Corimmun GmbH  
CoTherix Inc.

CRES Holdings, Inc.  
CrossRoads Extremity Systems, LLC  
CSATS, Inc.  
Debs-Vogue Corporation  
(Proprietary) Limited  
DePuy Hellas SA  
DePuy International Limited  
DePuy Ireland Unlimited Company  
DePuy Mexico, S.A. de C.V.  
DePuy Mitek, LLC  
DePuy Orthopaedics, Inc.  
DePuy Products, Inc.  
DePuy Spine, LLC  
DePuy Synthes Institute, LLC  
DePuy Synthes Products, Inc.  
DePuy Synthes Sales, Inc.  
DePuy Synthes, Inc.  
Dutch Holding LLC  
ECL7, LLC  
EES Holdings de Mexico,  
S. de R.L. de C.V.  
EES, S.A. de C.V.  
EIT Emerging Implant Technologies GmbH  
Ethicon Endo-Surgery (Europe) GmbH  
Ethicon Endo-Surgery, Inc.  
Ethicon Endo-Surgery, LLC  
Ethicon LLC  
Ethicon Sarl  
Ethicon US, LLC  
Ethicon Women's Health & Urology Sarl  
Ethicon, Inc.  
Ethnor (Proprietary) Limited  
Ethnor del Istmo S.A.  
Ethnor Farmaceutica, S.A.  
Finsbury (Development) Limited  
Finsbury (Instruments) Limited  
Finsbury Medical Limited  
Finsbury Orthopaedics International Limited  
Finsbury Orthopaedics Limited  
FMS Future Medical System SA  
GATT Technologies B.V.  
GH Biotech Holdings Limited  
Global Investment Participation B.V.  
GMED Healthcare BV  
Guangzhou Bioseal Biotech Co., Ltd.  
Hansen Medical Deutschland GmbH

Hansen Medical International, Inc.  
Hansen Medical UK Limited  
Hansen Medical, Inc.  
Healthcare Services (Shanghai) Ltd.  
I.D. Acquisition Corp.  
Innomedic Gesellschaft für innovative  
Medizintechnik und Informatik mbH  
J & J Company West Africa Limited  
J&J Argentina S.A.  
J&J Pension Trustees Limited  
J&J Productos Medicos & Farmaceuticos  
del Peru S.A.  
J.C. General Services BV  
Janssen Biologics (Ireland) Limited  
Janssen Biologics B.V.  
Janssen BioPharma, LLC  
Janssen Biotech, Inc.  
Janssen Cilag Farmaceutica S.A.  
Janssen Cilag S.p.A.  
Janssen Cilag SPA  
Janssen Cilag, C.A.  
Janssen Development Finance Unlimited  
Company  
Janssen Egypt LLC  
Janssen Farmaceutica Portugal Lda  
Janssen France Treasury Unlimited  
Company  
Janssen Global Services, LLC  
Janssen Holding GmbH  
Janssen Inc.  
Janssen Irish Finance Unlimited Company  
Janssen Japan Treasury Unlimited Company  
Janssen Korea Ltd.  
Janssen Mexico Treasury  
Unlimited Company  
Janssen Oncology, Inc.  
Janssen Ortho LLC  
Janssen Pharmaceutica  
(Proprietary) Limited  
Janssen Pharmaceutica NV  
Janssen Pharmaceutica S.A.  
Janssen Pharmaceutical K.K.  
Janssen Pharmaceutical Sciences  
Unlimited Company  
Janssen Pharmaceutical Unlimited Company  
Janssen Pharmaceuticals, Inc.

Janssen Products, LP  
Janssen R&D Ireland Unlimited Company  
Janssen Research & Development, LLC  
Janssen Sciences Ireland  
Unlimited Company  
Janssen Scientific Affairs, LLC  
Janssen Supply Group, LLC  
Janssen Vaccines & Prevention B.V.  
Janssen Vaccines Corp.  
Janssen-Cilag  
Janssen-Cilag (New Zealand) Limited  
Janssen-Cilag A/S  
Janssen-Cilag AG  
Janssen-Cilag Aktiebolag  
Janssen-Cilag AS  
Janssen-Cilag B.V.  
Janssen-Cilag d.o.o. Beograd  
Janssen-Cilag de Mexico S. de R.L. de C.V.  
Janssen-Cilag Farmaceutica Lda.  
Janssen-Cilag Farmaceutica Ltda.  
Janssen-Cilag GmbH  
Janssen-Cilag International NV  
Janssen-Cilag Kft.  
Janssen-Cilag Limited  
Janssen-Cilag Manufacturing, LLC  
Janssen-Cilag NV  
Janssen-Cilag OY  
Janssen-Cilag Pharma GmbH  
Janssen-Cilag Pharmaceutical S.A.C.I.  
Janssen-Cilag Polska, Sp. z o.o.  
Janssen-Cilag Pty Ltd  
Janssen-Cilag S.A.  
Janssen-Cilag s.r.o.  
Janssen-Cilag, S.A.  
Janssen-Cilag, S.A. de C.V.  
Janssen-Pharma, S.L.  
J-C Health Care Ltd.  
Jevco Holding, Inc.  
JJ Surgical Vision Spain, S.L.  
JJC Acquisition Company B.V.  
JJHC, LLC  
JJSV Belgium BV  
JJSV Manufacturing Malaysia SDN. BHD.  
JJSV Norden AB  
JJSV Produtos Otricos Ltda.  
JNJ Global Business Services s.r.o.

JNJ Holding EMEA B.V.  
JNJ International Investment LLC  
JNTL (APAC) HoldCo 2 LLC  
JNTL (APAC) HoldCo 3 Pte. Ltd.  
JNTL (APAC) HoldCo LLC  
JNTL (APAC) HoldCo Pte. Ltd.  
JNTL (Japan) HoldCo Inc.  
JNTL (Malaysia) Sdn. Bhd.  
JNTL (Middle East) HoldCo LLC  
JNTL (Puerto Rico) HoldCo GmbH  
JNTL (Shanghai) Investment Co., Ltd.  
JNTL (Switzerland) HoldCo GmbH  
JNTL (Thailand) HoldCo LLC  
JNTL (UK) HoldCo Limited  
JNTL Consumer Health (Belgium) BV  
JNTL Consumer Health (Brazil) Ltda.  
JNTL Consumer Health  
(Czech Republic) s.r.o.  
JNTL Consumer Health  
(Dominican Republic), S.A.S.  
JNTL Consumer Health (Finland) Oy  
JNTL Consumer Health (France) SAS  
JNTL Consumer Health (Hungary) Kft  
JNTL Consumer Health (India)  
Private Limited  
JNTL Consumer Health  
(New Zealand) Limited  
JNTL Consumer Health (Norway) AS  
JNTL Consumer Health (Philippines) Inc.  
JNTL Consumer Health (Poland) sp. z o.o.  
JNTL Consumer Health (Portugal) Limitada  
JNTL Consumer Health (Services) LLC  
JNTL Consumer Health (Slovakia), s.r.o.  
JNTL Consumer Health (Spain), S.L.  
JNTL Consumer Health (Taiwan) Limited  
JNTL Consumer Health (Vietnam) Co. Ltd.  
JNTL Consumer Health General  
Services BV  
JNTL Consumer Health I (Ireland) Limited  
JNTL Consumer Health I  
(Switzerland) GmbH  
JNTL Consumer Health II  
(Switzerland) GmbH  
JNTL Consumer Health LLC  
JNTL Consumer Health Mexico,  
S. de R.L. de C.V.

JNTL Consumer Health Middle  
East FZ-LLC

JNTL HoldCo 2 LLC

JNTL HoldCo 3 LLC

JNTL HoldCo 4 LLC

JNTL HoldCo 5 LLC

JNTL HoldCo 6 LLC

JNTL HoldCo 7 LLC

JNTL HoldCo 8 LLC

JNTL HoldCo LLC

JNTL Holdings 2, Inc.

JNTL Holdings 3, Inc.

JNTL Holdings B.V.

JNTL Holdings, Inc.

JNTL Ireland HoldCo 2 B.V.

JNTL Netherlands HoldCo B.V.

JNTL Turkey Tüketici Sağlığı

Limited Şirketi

Johnson & Johnson

Johnson & Johnson - Societa' Per Azioni

Johnson & Johnson (Angola), Limitada

Johnson & Johnson (Australia) Pty Ltd

Johnson & Johnson (Canada) Inc.

Johnson & Johnson (China) Investment Ltd.

Johnson & Johnson (Ecuador) S.A.

Johnson & Johnson (Egypt) S.A.E.

Johnson & Johnson (Hong Kong) Limited

Johnson & Johnson (Ireland) Limited

Johnson & Johnson (Jamaica) Limited

Johnson & Johnson (Kenya) Limited

Johnson & Johnson (Middle East) Inc.

Johnson & Johnson (Mozambique),

Limitada

Johnson & Johnson (Namibia)

(Proprietary) Limited

Johnson & Johnson (New Zealand) Limited

Johnson & Johnson (Philippines), Inc.

Johnson & Johnson (Private) Limited

Johnson & Johnson (Singapore)

Holdco LLC

Johnson & Johnson (Thailand) Ltd.

Johnson & Johnson (Trinidad) Limited

Johnson & Johnson (Vietnam) Co., Ltd

Johnson & Johnson AB

Johnson & Johnson AG

Johnson & Johnson Bulgaria EOOD

Johnson & Johnson China Ltd.

Johnson & Johnson Consumer

(Hong Kong) Limited

Johnson & Johnson Consumer

(Thailand) Limited

Johnson & Johnson Consumer B.V.

Johnson & Johnson Consumer

Holdings France

Johnson & Johnson Consumer Inc.

Johnson & Johnson Consumer NV

Johnson & Johnson Consumer

Saudi Arabia Limited

Johnson & Johnson Consumer Services

EAME Ltd.

Johnson & Johnson d.o.o.

Johnson & Johnson de Argentina S.A.C. e. I.

Johnson & Johnson de Chile S.A.

Johnson & Johnson de Colombia S.A.

Johnson & Johnson de Mexico, S.A. de C.V.

Johnson & Johnson de Uruguay S.A.

Johnson & Johnson de Venezuela, S.A.

Johnson & Johnson del Ecuador, S.A.

Johnson & Johnson Del Paraguay, S.A.

Johnson & Johnson del Peru S.A.

Johnson & Johnson do Brasil Industria E

Comercio de Produtos Para Saude Ltda.

Johnson & Johnson Dominicana, S.A.S.

Johnson & Johnson Enterprise

Innovation Inc.

Johnson & Johnson European Treasury

Unlimited Company

Johnson & Johnson Finance Corporation

Johnson & Johnson Finance Limited

Johnson & Johnson Financial

Services GmbH

Johnson & Johnson for Export and

Import LLC

Johnson & Johnson Gateway, LLC

Johnson & Johnson Gesellschaft m.b.H.

Johnson & Johnson GmbH

Johnson & Johnson GT, Sociedad Anónima

Johnson & Johnson Guatemala, S.A.

Johnson & Johnson Health and Wellness

Solutions, Inc.

Johnson & Johnson Health Care

Systems Inc.

Johnson & Johnson Hellas Commercial and  
Industrial S.A.  
Johnson & Johnson Hellas  
Consumer Products  
Commercial Societe Anonyme  
Johnson & Johnson Hemisferica S.A.  
Johnson & Johnson Holdco (NA) Inc.  
Johnson & Johnson Holding GmbH  
Johnson & Johnson Holdings  
(Austria) GmbH  
Johnson & Johnson Inc.  
Johnson & Johnson Industrial Ltda.  
Johnson & Johnson Innovation - JJDC, Inc.  
Johnson & Johnson Innovation Limited  
Johnson & Johnson Innovation LLC  
Johnson & Johnson International  
Johnson & Johnson International  
(Singapore) Pte. Ltd.  
Johnson & Johnson International Financial  
Services Unlimited Company  
Johnson & Johnson Irish Finance  
Company Limited  
Johnson & Johnson K.K.  
Johnson & Johnson Kft.  
Johnson & Johnson Korea Selling &  
Distribution LLC  
Johnson & Johnson Korea, Ltd.  
Johnson & Johnson Limited  
Johnson & Johnson LLC  
Johnson & Johnson Luxembourg Finance  
Company Sarl  
Johnson & Johnson Management Limited  
Johnson & Johnson Medical (China) Ltd.  
Johnson & Johnson Medical  
(Proprietary) Ltd  
Johnson & Johnson Medical (Shanghai) Ltd.  
Johnson & Johnson Medical (Suzhou) Ltd.  
Johnson & Johnson Medical B.V.  
Johnson & Johnson Medical Devices &  
Diagnostics Group - Latin America,  
L.L.C.  
Johnson & Johnson Medical GmbH  
Johnson & Johnson Medical Greece  
Single Member S.A.  
Johnson & Johnson Medical Korea Ltd.  
Johnson & Johnson Medical Limited

Johnson & Johnson Medical Mexico,  
S.A. de C.V.  
Johnson & Johnson Medical NV  
Johnson & Johnson Medical  
Products GmbH  
Johnson & Johnson Medical Pty Ltd  
Johnson & Johnson Medical S.A.  
Johnson & Johnson Medical S.p.A.  
Johnson & Johnson Medical SAS  
Johnson & Johnson Medical  
Saudi Arabia Limited  
Johnson & Johnson Medical Taiwan Ltd.  
Johnson & Johnson Medical, S.C.S.  
Johnson & Johnson Medikal Sanayi ve  
Ticaret Limited Sirketi  
Johnson & Johnson MedTech  
(Thailand) Ltd.  
Johnson & Johnson Medtech  
Colombia S.A.S.  
Johnson & Johnson Middle East FZ-LLC  
Johnson & Johnson Morocco  
Societe Anonyme  
Johnson & Johnson Nordic AB  
Johnson & Johnson Pacific Pty Limited  
Johnson & Johnson Pakistan  
(Private) Limited  
Johnson & Johnson Panama, S.A.  
Johnson & Johnson Personal Care  
(Chile) S.A.  
Johnson & Johnson Pharmaceutical Ltd.  
Johnson & Johnson Poland Sp. z o.o.  
Johnson & Johnson Private Limited  
Johnson & Johnson Pte. Ltd.  
Johnson & Johnson Pty. Limited  
Johnson & Johnson Romania S.R.L.  
Johnson & Johnson S.E. d.o.o.  
Johnson & Johnson S.E., Inc.  
Johnson & Johnson Sante Beaute France  
Johnson & Johnson SDN. BHD.  
Johnson & Johnson Services, Inc.  
Johnson & Johnson Surgical Vision India  
Private Limited  
Johnson & Johnson Surgical Vision, Inc.  
Johnson & Johnson Taiwan Ltd.  
Johnson & Johnson UK Treasury  
Company Limited

Johnson & Johnson Ukraine LLC  
Johnson & Johnson Urban  
Renewal Associates  
Johnson & Johnson Vision Care  
(Australia) Pty Ltd  
Johnson & Johnson Vision Care  
(Shanghai) Ltd.  
Johnson & Johnson Vision Care Ireland  
Unlimited Company  
Johnson & Johnson Vision Care, Inc.  
Johnson & Johnson Vision Korea, Ltd.  
Johnson & Johnson, Lda  
Johnson & Johnson, S.A.  
Johnson & Johnson, S.A. de C.V.  
Johnson & Johnson, s.r.o.  
Johnson & Johnson, s.r.o.  
Johnson and Johnson (Proprietary) Limited  
Johnson and Johnson Sihhi Malzeme Sanayi  
Ve Ticaret Limited Sirketi  
Johnson Y Johnson de Costa Rica, S.A.  
JOM Pharmaceutical Services, Inc.  
Kenvue Inc.  
La Concha Land Investment Corporation  
McNeil AB  
McNeil Consumer Pharmaceuticals Co.  
McNeil Denmark ApS  
McNeil Healthcare (Ireland) Limited  
McNeil Healthcare (UK) Limited  
McNeil Healthcare LLC  
McNeil Iberica S.L.U.  
McNeil LA LLC  
McNEIL MMP, LLC  
McNeil Nutritionals, LLC  
McNeil Panama, LLC  
McNeil Products Limited  
McNeil Sweden AB  
Medical Device Business Services, Inc.  
Medical Devices & Diagnostics  
Global Services, LLC  
Medical Devices International LLC  
Medos International Sarl  
Medos Sarl  
MegaDyne Medical Products, Inc.  
Menlo Care De Mexico, S.A. de C.V.  
Mentor B.V.  
Mentor Deutschland GmbH

Mentor Medical Systems B.V.  
Mentor Partnership Holding  
Company I, LLC  
Mentor Texas GP LLC  
Mentor Texas L.P.  
Mentor Worldwide LLC  
Middlesex Assurance Company Limited  
Momenta Ireland Limited  
Momenta Pharmaceuticals, Inc.  
NeoStrata Company, Inc.  
NeoStrata UG (haftungsbeschränkt)  
Netherlands Holding Company  
Neuravi Limited  
NeuWave Medical, Inc.  
Novira Therapeutics, LLC  
NuVera Medical, Inc.  
Obtech Medical Mexico, S.A. de C.V.  
OBTECH Medical Sarl  
OGX Beauty Limited  
OMJ Holding GmbH  
OMJ Pharmaceuticals, Inc.  
Omrix Biopharmaceuticals Ltd.  
Omrix Biopharmaceuticals NV  
Omrix Biopharmaceuticals, Inc.  
Ortho Biologics LLC  
Ortho Biotech Holding LLC  
Orthospin Ltd.  
Orthotaxy SAS  
Patriot Pharmaceuticals, LLC  
Peninsula Pharmaceuticals, LLC  
Percivia LLC  
Pharmadirect Ltd.  
Pharmedica Laboratories  
(Proprietary) Limited  
preCARDIA, Inc.  
Princeton Laboratories, Inc.  
Productos de Cuidado Personal y  
de La Salud de Bolivia S.R.L.  
Proleader S.A.  
Prosidyan, Inc.  
PT Integrated Healthcare Indonesia  
PT Johnson & Johnson Indonesia  
PT Johnson and Johnson Indonesia Two  
Pulsar Vascular, Inc.  
Regency Urban Renewal Associates  
RespiVert Ltd.

Review Manager Test Entity 2  
Royalty A&M LLC  
Rutan Realty LLC  
Scios LLC  
Serhum S.A. de C.V.  
Shanghai Elsker Mother & Baby Co., Ltd  
Shanghai Johnson & Johnson Ltd.  
Shanghai Johnson & Johnson  
Pharmaceuticals Ltd.  
Sodiac ESV  
Spectrum Vision Limited Liability Company  
Spectrum Vision Limited Liability  
Partnership  
SterilMed, Inc.  
Surgical Process Institute  
Deutschland GmbH  
Synthes Costa Rica S.C.R., Limitada  
SYNTHES GmbH  
Synthes GmbH  
Synthes Holding AG  
Synthes Holding Limited  
SYNTHES Medical Immobilien GmbH  
Synthes Medical Surgical Equipment &  
Instruments Trading LLC  
Synthes Produktions GmbH  
Synthes Proprietary Limited  
Synthes S.M.P., S. de R.L. de C.V.  
Synthes Tuttlingen GmbH  
Synthes USA Products, LLC  
Synthes USA, LLC  
Synthes, Inc.  
TARIS Biomedical LLC  
TearScience, Inc.  
The Anspach Effort, LLC  
The Vision Care Institute, LLC  
Tibotec, LLC  
Torax Medical, Inc.  
UAB "Johnson & Johnson"  
Vania Expansion  
Verb Surgical Inc.  
Vision Care Finance Unlimited Company  
Vogue International LLC  
WH4110 Development Company, L.L.C.  
Xian Janssen Pharmaceutical Ltd.  
XO1 Limited  
Zarbee's, Inc.

**Managers and Officers of the Debtor**

John Kim  
Richard Dickinson  
Robert Wuesthoff  
Russell Deyo

**Major Current Business Affiliations of Debtor's Managers**

American Foundation for Opioid  
Alternatives  
Migration Policy Institute  
Miller Center for Community Protection &  
Reliance, Eagleton Institute of Politics,  
Rutgers University  
National Center for State Courts  
National Council, McLean Hospital  
One Mind

**Depository and Disbursement Banks**

Bank of America, N.A.

**Major Sureties**

Chubb  
Federal Insurance Company  
Liberty Mutual Insurance Company  
Travelers Casualty and Surety Company  
of America

**Parties to Material Contracts With the Debtor**

Johnson & Johnson  
Johnson & Johnson Holdco (NA) Inc.  
Johnson & Johnson Services, Inc.

**Significant Co-Defendants in Talc-Related Litigation**

3M Company  
A.O. Smith Corporation  
Albertsons Companies, Inc.  
Avon Products, Inc.  
Barretts Minerals, Inc.  
BASF Catalysts LLC  
Block Drug Company, Inc.  
Borg Warner Morse Tec, Inc.  
Brenntag North America  
Brenntag Specialties, Inc.



Bristol-Myers Squibb Company  
Carrier Corporation  
Chanel, Inc.  
Charles B. Chrystal Co., Inc.  
Chattem, Inc.  
Colgate-Palmolive Company  
Conopco Inc.  
Costco Wholesale Corporation  
Coty, Inc.  
Crane Co.  
CVS Health Corporation  
CVS Pharmacy, Inc.  
Cyprus Amax Minerals Company  
Cyprus Mines Corporation  
Dana Companies, LLC  
DAP Products, Inc.  
Dollar General Corporation  
Duane Reade Inc.  
Eaton Corporation  
Eli Lilly and Company  
Elizabeth Arden, Inc.  
Estee Lauder Inc.  
Family Dollar Stores Inc.  
Flowserve US, Inc.  
FMC Corporation  
Food 4 Less of California, Inc.  
Ford Motor Company  
Foster Wheeler, LLC  
Gardner Denver, Inc.  
General Electric Company  
Genuine Parts Company  
Goodyear Tire & Rubber Co.  
Goulds Pumps, LLC  
Grinnell LLC  
Honeywell International, Inc.  
Imerys Talc America, Inc.  
Imerys USA, Inc.  
IMO Industries Inc.  
John Crane, Inc.  
K&B Louisiana Corporation  
Kaiser Gypsum Company, Inc.  
Kmart Corporation  
Kolmar Laboratories  
Longs Drug Stores California  
L'Oreal USA, Inc.  
Lucky Stores, Inc.

Macy's, Inc.  
Mary Kay Inc.  
Maybelline LLC  
Metropolitan Life Insurance Company  
Noxell Corporation  
Personal Care Products Council  
Pfizer, Inc.  
Pharma Tech Industries, Inc.  
Pneumo Abex, LLC  
PTI Royston, LLC  
Publix Super Markets, Inc.  
R.T. Vanderbilt Holding Company, Inc.  
Ralphs Grocery Company  
Revlon Consumer Products Corporation  
Revlon, Inc.  
Rite Aid Corporation  
Safeway, Inc.  
Sanofi-Aventis U.S. LLC  
Shulton, Inc.  
Specialty Minerals Inc.  
Target Corporation  
The Dow Chemical Company  
The Estee Lauder Companies, Inc.  
The Kroger Co.  
The Procter & Gamble Company  
Thrifty Payless, Inc.  
Unilever Home & Personal Care USA  
Union Carbide Corporation  
Vanderbilt Minerals, LLC  
ViacomCBS, Inc.  
Walgreen Co.  
Walmart, Inc.  
Warren Pumps, LLC  
Whittaker Clark & Daniels, Inc.  
Wyeth Holdings LLC  
Yves Saint Laurent America, Inc.

**Debtor's Proposed Professionals and  
Claims Agent**

AlixPartners LLP  
Bates White LLC  
Blake, Cassels & Graydon LLP  
Epiq Corporate Restructuring LLC  
Hogan Lovells  
Jones Day  
King & Spalding LLP

McCarter & English, LLP  
Orrick, Herrington, & Sutcliffe, LLP  
Shook, Hardy & Bacon L.L.P.  
Skadden, Arps, Slate, Meager & Flom LLP  
Weil Gotshal & Manges LLP  
Wollmuth Maher & Deutsch LLP

**Debtor's Proposed Significant Ordinary  
Course Professionals, Consultants and  
Service Providers**

Adler Pollock & Sheehan PC  
Barrasso Usdin Kupperman  
Freeman & Sarver, L.L.C.  
Blank Rome LLP  
Butler Snow LLP  
Carlton Fields, P.A.  
Chehardy, Sherman, Williams,  
Recile, & Hayes  
Damon Key Leong Kupchak Hastert  
Davis Hatley Haffeman & Tighe  
Dechert LLP  
Elliott Law Offices, PA  
Faegre Drinker Biddle & Reath LLP  
Folliart, Huff, Ottaway & Bottom  
Gibson, Dunn & Crutcher LLP  
Goldman Ismail Tomaselli Brennan &  
Baum  
Hartline Barger  
HeplerBroom LLC  
Irwin Fritchie Urquhart & Moore LLC  
Johnson & Bell Ltd.  
Jones, Skelton & Hochuli, P.L.C.  
Kaplan, Johnson, Abate & Bird LLP  
Kelley Jasons McGowan Spinelli  
Hanna & Reber, LLP  
Kirkland & Ellis LLP  
Kitch Drutchas Wagner  
Valitutti & Sherbrook  
Lewis Brisbois Bisgaard & Smith, LLP  
Manion Gaynor & Manning LLP  
Manning Gross + Massenburg  
Miles & Stockbridge  
Milligan & Hems  
Morgan Lewis  
Nelson Mullins Riley & Scarborough, LLP  
Nutter McClennen & Fish LLP

Patterson Belknap Webb & Tyler LLP  
Proskauer Rose LLP  
Quattlebaum, Grooms & Tull PLLC  
Schnader Harrison Segal & Lewis  
Schwabe Williamson & Wyatt  
Sills Cummis & Gross P.C.  
Stoel Rives LLP  
Sullivan Whitehead & Deluca LLP  
Swartz Campbell LLC  
The Weinhardt Law Firm  
Tucker Ellis LLP  
Willcox & Savage, P.C.

**Known Professionals for Certain  
Non-Debtor Parties in Interest**

Barnes & Thornburg, LLP  
Cravath, Swaine & Moore  
White & Case LLP

**Proposed Future Claimants'  
Representative and Her Proposed  
Professional**

Randi S. Ellis  
Walsh Pizzi O'Reilly Falanga LLP

**Material Potentially Indemnified Parties**

Bausch Health Companies Inc.  
Cyprus Mines Corporation  
Cyprus Talc Corp.  
Imerys Talc America, Inc.  
Imerys Talc Vermont, Inc.  
Luzenac America, Inc.  
Pharma Tech Industries, Inc.  
PTI Royston, LLC  
Rio Tinto America, Inc.  
RTZ America, Inc.  
Valeant Pharmaceuticals International, Inc.  
Windsor Minerals Inc.  
Costco Wholesale Corporation  
Publix Super Markets, Inc.  
Rite Aid Corporation  
Safeway Inc.  
Walmart Inc.

**Parties Who Have Entered Into Plan  
Support Agreements**

Andres Pereira Firm  
Ferrer, Poirot & Wansbrough  
Johnson Law Group  
Liakos Law, APC  
Linville Law Group  
McDonald Worley  
Nachawati Law Group  
OnderLaw, LLC  
Pulaski Kherkher PLLC  
Rueb Stoller Daniel, LLP  
Seeger Weiss LLP  
Slater Slater Schulman LLP  
Trammell PC  
Watts Guerra LLP  
Wisner Baum, LLP

**Law Firms with Significant  
Representations of Talc Claimants**

Andres Pereira Firm  
Arnold & Itkin LLP  
Aylstock, Witkin, Kreis &  
Overholtz, PLLC  
Beasley Allen Law Firm  
Childers, Schlueter & Smith LLC  
Ferrer, Poirot & Wansbrough  
Johnson Law Group  
Linville Law Group  
McDonald Worley  
Miller Firm, LLC  
Nachawati Law Group  
Napoli Shkolnik PLLC  
OnderLaw, LLC  
Pulaski Kherkher PLLC  
Robinson Calcagnie  
Rueb Stoller Daniel, LLP  
Sanders, Phillips, Grossman, LLC  
Seeger Weiss LLP  
Slater Slater Schulman LLP  
Trammell PC  
Wagstaff Law Firm  
Watts Guerra LLP  
Wisner Baum, LLP

**Key Parties in *Imerys Talc America, Inc.*  
and *Cyprus Mines Corp.* Chapter 11 Cases**

Cyprus Amax Minerals Company  
Cyprus Mines Corporation  
Cyprus Talc Corporation  
Imerys S.A.  
Imerys Talc America, Inc.  
Imerys Talc Vermont, Inc.  
(fka Windsor Minerals Inc.)  
James L. Patton  
Luzenac America, Inc.  
Official Committee of Tort Claimants  
(*In re Imerys Talc America, Inc.*)  
Official Committee of Tort Claimants  
(*In re Cyprus Mines Corp.*)  
Roger Frankel

**Debtor's Insurers**

A.G. Securitas  
ACE Property & Casualty Insurance  
Company  
Aetna Casualty and Surety Company  
Affiliated FM Ins. Company  
AIG Europe S.A.  
AIG Property and Casualty Company  
AIU Ins. Company  
Allianz Global Risks US  
Insurance Company  
Allianz Ins. Company  
Allstate Insurance Company  
American Centennial Ins. Company  
American Motorists Ins. Company  
American Re-Insurance Company  
Arrowood Indemnity Company  
ASR Schadeverzekering N.V.  
Assurances Generales De France  
Assurantiekantoor VanWijk & Co.  
Atlanta International Insurance Company,  
n/k/a Wellfleet New York Insurance  
Company  
Birmingham Fire Ins. Company of  
Pennsylvania  
Central National Ins. Company of Omaha  
Century Indemnity Company  
Champion Dyeing Allocation Year  
Chubb

City Ins. Company  
Colonia Versicherungs AG, Koln  
Company of N.Y.  
Continental Insurance Company  
Darag Deutsche Versicherungs-Und  
Drake Ins. Company of New York  
Employers Ins. Company of Wausau  
Employers Ins. of Wausau  
Employers Mutual Casualty Company  
Eurinco Allgemeine  
Everest Reinsurance Company  
Fireman's Fund Ins. Company  
First State Ins. Company  
GAP  
Gibraltar Casualty Company  
Granite State Ins. Company  
Great American  
Great Northern Ins. Company  
Great Southwest Fire Ins. Company  
Groupe Drouot  
Harbor Ins. Company  
Hartford Accident and Indemnity Company  
Home Ins. Company  
Ideal Mutual Ins. Company  
Industrial Indemnity Company  
Ins. Company of North America  
Ins. Company of the State of Pennsylvania  
Ins. Corporation of Singapore Limited  
Integrity Ins. Company  
International Ins. Company  
International Surplus Lines Ins. Company  
Lexington Ins. Company  
London Guarantee and Accident  
L'Union Atlantique S.A. d'Assurances  
Maas Lloyd  
Mead Reinsurance Corporation  
Middlesex Assurance Company  
Midland Ins. Company  
Midstates Reinsurance Corp.  
Mission Ins. Company  
Mission National Ins. Company  
Munich Reinsurance America, Inc.  
Mutual Fire, Marine, & Inland Ins.  
Company  
N.V. De Ark  
N.V. Rotterdamse Assurantiekas

N.V. Schadeverzekeringsmaatschappij  
National Casualty Company  
National Union Fire Ins. Company of  
Pittsburgh, PA  
Nationwide  
New Hampshire Ins. Company  
North River Ins. Company  
Northbrook Excess and Surplus  
Ins. Company  
Northeastern Fire Ins. Company  
of Pennsylvania  
Pacific Employers Ins. Company  
ProSight  
Prudential Reinsurance Company  
Puritan Insurance Company  
Republic Indemnity Company of America  
Republic Ins. Company  
Republic Western Ins. Company  
Repwest Insurance Company  
Resolute Management Inc.  
Rheinland Versicherungen  
Rheinland Verzekeringen  
Riverstone Insurers  
Royal Belge I.R., S.A. d'Assurances  
Royal Indemnity Company  
Royal Ins. Company  
Rückversicherungs-AG  
Safety Mutual Casualty Corporation  
Safety National Casualty Corporation  
Seguros La Republica SA  
Sentry Insurance A Mutual Company  
Southern American Ins. Company  
Starr Indemnity & Liability Company  
TIG Insurance Company  
Transamerica Premier Insurance Company  
Transit Casualty Company  
Travelers Casualty and Surety Company  
UAP  
Union Atlantique d'Assurances S.A.  
Union Indemnity Ins. Company  
of New York  
Versicherungs AG, Dusseldorf  
Westchester Fire Insurance Company  
Westport Insurance Corporation  
XL Ins. Company

**Potential Parties in Canadian Proceeding**

Cassels Brock & Blackwell LLP  
Ernst & Young Inc.

Washington, D.C.  
West Virginia  
Wisconsin

**States/Federal District With Consumer  
Protection Investigations/Actions**

Alabama  
Alaska  
Arkansas  
Arizona  
Colorado  
Connecticut  
Delaware  
Florida  
Georgia  
Hawaii  
Idaho  
Illinois  
Iowa  
Kansas  
Kentucky  
Maine  
Maryland  
Massachusetts  
Michigan  
Minnesota  
Mississippi  
Montana  
Nebraska  
Nevada  
New Hampshire  
New Jersey  
New Mexico  
New York  
North Carolina  
North Dakota  
Ohio  
Oklahoma  
Oregon  
Rhode Island  
South Dakota  
Texas  
Utah  
Vermont  
Virginia  
Washington

**The Office of the United States Trustee –  
Region 3 – District of New Jersey**

Adam Shaarawy  
Adela Alfaro  
Alexandria Nikolinos  
Angeliza Ortiz-Ng  
Daniel C. Kropiewnicki  
David Gerardi  
Fran B. Steele  
Francyne D. Arendas  
James Stives  
Jeffrey Sponder  
Joseph C. Kern  
Kirsten K. Ardelean  
Lauren Bielskie  
Maggie McGee  
Martha Hildebrandt  
Michael Artis  
Neidy Fuentes  
Peter J. D'Auria  
Robert J. Schneider, Jr.  
Tia Green  
Tina L. Oppelt  
William J. Ziemer

**Bankruptcy Judges for the District  
of New Jersey**

Judge Andrew B. Altenburg, Jr.  
Judge Christine M. Gravelle  
Judge Jerrold N. Poslusny, Jr.  
Judge John K. Sherwood  
Judge Kathryn C. Ferguson  
Judge Michael B. Kaplan  
Judge Rosemary Gambardella  
Judge Stacey L. Meisel  
Judge Vincent F. Papalia

## **SCHEDULE 2**

### **Disclosure Schedule**

- In connection with the proposed employment and retention of AlixPartners, LLP (“AlixPartners”) by the Debtor in this Chapter 11 Case, AlixPartners undertook a complex process, the details of which are set forth below, to determine whether it had any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtor’s estate.

AlixPartners Holdings, LLP, AlixPartners’ parent company (“Holdings”), directly or indirectly owns Holdings’ U.S. and non-U.S. subsidiaries (collectively, the “Holdings Enterprise”). The equity capital of Holdings is owned by the following investors:

- (i) Lakeview Capital Holdings, Inc., the Jay Alix Living Trust and other trusts established by Jay Alix (collectively the “Lakeview Parties”);
- (ii) Caisse de dépôt et placement du Québec (“CDPQ”);
- (iii) Investcorp Holdings B.S.C. (“IVC”);
- (iv) Public Sector Pension Investment Board (“PSP”); and
- (v) current and certain former Managing Directors of AP (as defined below) and their individual and family trusts, as well as certain other individuals, including current members of the Boards (as hereinafter defined) and employees of the Lakeview Parties, and their individual and family trusts.

(Collectively, (i) – (v) above are hereinafter referred to as the “Investors”, and the subset (ii) – (iv) above are hereinafter referred to as the “Institutional Investors”).

Holdings and AlixPartners, each have a board of directors (together, the “Boards”). No individual or entity controls either of the Boards. Designees of each of the Investors (i) – (iv) above serve as members of the Boards. The Holdings Enterprise does not invest in distressed assets of any class, nor does it have any investment affiliates.

CDPQ is one of Canada’s largest institutional investment managers. It manages investments on behalf of most of Quebec Canada’s public and parapublic pension and insurance funds. CDPQ invests globally in numerous industries.

IVC is a leading global provider and manager of alternative investment products.

PSP is one of Canada’s largest pension investment managers. It invests funds for the pension plans of the Public Service, the Canadian Armed Forces, the Royal Canadian Mounted Police and the Reserve Force. PSP manages a diversified global portfolio in numerous industries throughout the world.

The Lakeview Parties and related entities are entities owned or controlled by Jay Alix that, among other things, make investments on behalf of Mr. Alix and his family.

In addition to their investments in Holdings, the Institutional Investors have substantial investments unrelated to AlixPartners.

The Boards are not involved in the delivery of client services and their members do not have access to client files, except for a minority of members of the Boards that are AlixPartners employees. As a precautionary matter, AlixPartners maintains information barriers and guidelines designed to prevent certain confidential client information, including the names of clients likely to be involved

in a not-yet-filed case under the Bankruptcy Code, from being shared with the Investors or their designees on the Boards.

To that end, no material nonpublic information about the Debtor (including, before the filing of this Chapter 11 Case, the fact that AlixPartners was about to undertake an assignment involving the Debtor) has been or will be furnished by AlixPartners to the Investors or their Board designees, and AlixPartners will continue to abide by its confidentiality obligations to the Debtor. Each Investor is independent of each other Investor and is governed by its own board of directors or similar body and managed by its own management team. AlixPartners operates independently and does not share employees, officers or other management with any of the Investors. AlixPartners and each of the Investors have separate offices in separate buildings, use separate internet email addresses, and do not otherwise share IT systems.

AlixPartners formed and currently holds a majority and controlling ownership interest in GSS UK Holdings Limited (“GSS”). GSS and its subsidiaries developed a regulatory technology platform to provide global, centralized sanctions screening services to financial institutions. Various Investors, including certain AlixPartners managing directors and Board members, hold minority ownership interests in GSS. AlixPartners currently has a majority of the seats on the board of directors of GSS. GSS does not share office space or IT systems with AlixPartners, but does share certain employees and services such as finance systems. The names of GSS’s investors and customers (but not its vendors and employees) are loaded into the database where AlixPartners’ connections are stored and are disclosed as part of the disclosure process described herein.

AlixPartners has one database where connections are stored for all entities in the Holdings Enterprise. The process for the preparation of disclosures is as follows: upon receipt of a potential parties in interest list from the Debtor and/or its representatives (the “Parties in Interest List”), all such parties are input to the database by team members familiar with the database. A report of the “hits” is generated, and the team members review those “hits” for connections. Where there is a connection, a disclosure is drafted. After the team completes draft disclosures, the disclosures are reviewed by an in-house bankruptcy attorney. The attorney coordinates with the team to finalize the disclosures, which are then reviewed by the engagement AlixPartners managing director. These initial disclosures (the “Initial Disclosures”) are thereafter filed with the Bankruptcy Court as part of the retention pleadings.

Promptly thereafter, a bankruptcy paralegal in the firm uses the Initial Disclosures and the parties in interest list to draft a firmwide email for each bankruptcy filing, including the Debtor’s case. This email is sent to every firm employee as well as the members of the Boards and the Lakeview Parties. The firmwide email requests each recipient to review the attached file that includes the parties in interest and corresponding disclosures, and asks that every recipient: (a) contact the legal department in the event that they have a connection or relationship with an interested party that is not included in our disclosures; (b) if they have a connection or relationship with an interested party that is included in our disclosures, confirm that it is accurately described; and (c) contact the legal department if they own securities of the Debtor. Members of the legal team review all email responses and draft any supplemental disclosures appropriate to reflect information received in response to the firmwide email. After the review process described in the immediately preceding paragraph, supplemental disclosures are thereafter filed with the Bankruptcy Court.

After the Initial Disclosures are filed with the Bankruptcy Court, AlixPartners also provides the names of the Debtor, its owners/investors, lenders and, on a case-by-case basis, other named entities (collectively, the “Investor Search Parties”), to the Institutional Investors, and requests that each Institutional Investor run a check of the Investor Search Parties across all investment portfolios including, upon reasonable investigation, (i) private and public funds, (ii) loan positions, and (iii) known positions across CLO holdings (all of the foregoing subject to the exceptions listed below,

the “Investor Connections Check”). The exceptions to the Investor Connections Check are (i) investments over which the Institutional Investors do not possess actual investment authority and discretion (“direct control”), (ii) index replication position, (iii) investments owned in separate accounts managed by independent parties not affiliated with the Institutional Investors, and (iv) pooled investment vehicles in which the Institutional Investors do not exercise actual control or in which the Institutional Investors do not have visibility sufficient to ascertain such vehicle’s investments. Members of the legal team review all responses received from the Institutional Investors and draft disclosures appropriate to reflect information received from the Institutional Investors that, following review, are filed with the Bankruptcy Court.

Upon receipt of the responses from the Institutional Investors to the Investor Connections Check, AlixPartners will file any supplemental disclosures which may be required.

To the extent AlixPartners learns of connections that are not included herein, AlixPartners will promptly file a supplemental disclosure.

Further, AlixPartners may have had, currently have or may in the future have business relationships with, among other entities, portfolio companies of the Institutional Investors and portfolio companies of private equity funds in which they are limited partners, in matters unrelated to the Debtor or its affiliates in this Chapter 11 Case. Based on, among other things, the business separation between each of the Investors and AlixPartners, the contractual client confidentiality obligations of AlixPartners and the information barriers referred to above, AlixPartners believes that it does not hold or represent an interest adverse to the estate with respect to any such engagement.

Other than as specifically noted herein, AlixPartners has not undertaken to determine the existence, nature, and/or full scope of any business relationships or connections that the Investors may have with the Investor Search Parties, the Debtor and its affiliates, and other parties in interest in this Chapter 11 Case.

Specifically, AlixPartners obtained from the Debtor and/or its representatives the Parties in Interest List, which is attached hereto as Schedule 1 and conducted a search for connections in accordance with the procedures set forth above.

AlixPartners represents that, to the best of its knowledge, it knows of no fact or situation that would represent a conflict of interest, cause it not to be disinterested or hold or represent an interest adverse to the Debtor’s estate, and furthermore wishes to disclose the following with respect to the Holdings Enterprise (collectively, “AP”, unless otherwise noted):

- AP interacts with U.S. Bankruptcy Court judges and representatives of the U.S. Trustee Program regularly in its capacity as a professional consulting firm that offers turnaround and restructuring services.
- AP has issued debt in the form of a USD-denominated senior secured term loan, and a Euro-denominated senior secured term loan (collectively, the “Term Loans”), as well as a Revolving Credit Facility.

Bank of America, N.A. serves as the Administrative Agent for the Term Loans and the Revolving Credit Facility and as such manages all trading of the Term Loans and Revolving Credit Facility between investors. Many of the holders of the Term Loans are pools organized by banks, mutual fund management companies and other fund managers (collectively, “Fund Managers”) who pool debt instruments issued by multiple / different borrowers and offer interests in the pools to investors. The identities of the investors in the pools cannot be ascertained by AP. The Term



Loans are actively traded. Thus, the list of Fund Managers and other investors directly holding the Term Loans can become outdated quickly. On a monthly basis, AP reviews the list of investors in the Term Loans for the purpose of making relationship disclosures in chapter 11 cases. As of the last monthly report, no Fund Manager or other investor in the Term Loans held greater than 10% of the combined US-denominated and Euro-denominated Term Loans. In the event that any entity accumulates a 10% or greater interest in the combined US-denominated and Euro-denominated Term Loans, AP will disclose the name of such entity.

The participants in the Revolving Credit Facility are Bank of America, N.A., Credit Suisse, Deutsche Bank AG Host Bank, Goldman Sachs Lending Partners LLC, HSBC Bank USA, NA, and JPMorgan Chase Bank N.A.

- The Internal Revenue Service (“IRS”) is a current and former AP client in matters unrelated to the Debtor. The IRS is a lienholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. The IRS is a former employer of a current AP employee.
- The United States Department of Justice (“DOJ”), including the United States Attorney General’s Office, is a current and former client of AP in matters unrelated to the Debtor. The DOJ is a litigation party, adverse litigation party, lessor and professional to current and former AP clients in matters unrelated to the Debtor.
- AP follows a practice to solicit from the members of its Boards their connections to the parties in interest independent of AP. In response, one or more of the members of its Boards have offered the following disclosures:
  - Bank of America, N.A., a banking services provider to the Debtor, is a lender to an AP investor or one of its affiliates.
  - Chubb, a major surety and insurance provider to the Debtor, is a vendor to an AP investor or one of its affiliates. AP has a group insurance program in place for all U.S. partners and managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from Chubb at group rates.
  - Faegre Drinker Biddle & Reath LLP, an ordinary course professional to the Debtor, is a former legal services provider to an AP investor or one of its affiliates.
  - McCarter & English, LLP, a proposed professional to the Debtor, is a current or former legal services provider to an AP investor or one of its affiliates.
  - Proskauer Rose LLP (“Proskauer”) is an ordinary course professional to the Debtor. An AP investor or one of its affiliates is involved in a litigation matter unrelated to this bankruptcy matter in which Proskauer is opposing counsel..
- LTL Management LLC (“LTL”), the Debtor in this bankruptcy matter, was also an AP client in matters related to LTL’s previous chapter 11 bankruptcy filing in 2021 wherein AP was retained by the Debtor. To the extent that parties in interest from LTL’s 2021 filing are also parties in interest in this Chapter 11 Case, AP has connections by virtue of its former role in the 2021 bankruptcy filing. Any further connections to parties in interest are outlined herein.
- 3M Company, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“3M”) are litigation parties, adverse litigation parties, parent companies, and affiliates to current and former AP clients in matters unrelated to the Debtor. 3M is a former AP client in matters unrelated to the Debtor. 3M is a former employer of current AP employees.

- A.O. Smith Corporation, a significant co-defendant to the Debtor in talc-related litigation, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- ACE Property & Casualty Insurance Company, an insurance provider to the Debtor, and affiliates (“ACE”) are bondholders, litigation parties, adverse litigation parties, affiliates, lenders, lienholders, parent companies, and shareholders to current and former AP clients in matters unrelated to the Debtor. ACE is a current and former AP client in matters unrelated to the Debtor. AP has a group insurance program in place for all U.S. managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from an affiliate of ACE at group rates. ACE is a vendor to AP.
- Aetna Casualty and Surety Company, an insurance provider to the Debtor, and affiliates (“Aetna”), are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Aetna is an employee benefits provider to AP.
- Affiliated FM Insurance Company, an insurance provider to the Debtor, is an adverse litigation party to a former AP client in matters unrelated to the Debtor.
- AIG Europe S.A. and AIG Property and Casualty Company, insurance providers to the Debtor, and affiliates (“AIG”) are bondholders, adverse litigation parties, lenders and lessors to current and former AP clients in matters unrelated to the Debtor. AIG is a former AP client in matters unrelated to the Debtor. AIG is a former employer of current AP employees. Illinois National Insurance Company (“INIC”), an affiliate of AIG, is a former insurance provider to AP. INIC was adverse to AP in a former litigation regarding an insurance dispute in matters unrelated to the Debtor.
- AIU Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Alabama, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Alaska, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. Alaska is a current AP client in matters unrelated to the Debtor.
- Albertsons Companies, a significant co-defendant to the Debtor in talc-related litigation, is a related party, litigation party, and adverse litigation party to current AP clients in matters unrelated to the Debtor.
- Allianz Global Risks US Insurance Company and Allianz Insurance Company, insurance providers to the Debtor, and affiliates (“Allianz”) are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Allianz is an insurance provider to AP.
- Allstate Insurance Company, an insurance provider to the Debtor, and affiliates (“Allstate”) are bondholders, litigation parties, adverse litigation parties, lenders, and lienholders to current and former AP clients in matters unrelated to the Debtor. Allstate is a current AP client in matters unrelated to the Debtor.
- American Re-Insurance Company, an insurance provider to the Debtor, and affiliates (“American Insurance”) are litigation parties, adverse litigation parties, lenders, lessors, and limited partners to

current and former AP clients in matters unrelated to the Debtor. American Insurance is a vendor to AP.

- Arizona, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, lender and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Arkansas, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, lender, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Arnold & Itkin LLP, a law firm with significant representation of talc claimants, is counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtor.
- Arrowood Indemnity Company, an insurance provider to the Debtor, is a litigation party, adverse litigation party, lender, and shareholder to current and former AP clients in matters unrelated to the Debtor.
- Aylstock, Witkin, Kreis & Overholtz, PLLC, a law firm with significant representation of talc claimants, is opposing counsel to a current AP client in matters unrelated to the Debtor.
- Bank of America, N.A., a banking services provider to the Debtor, and affiliates (“BofA”) are bondholders, litigation parties, adverse litigation parties, investors, lenders, lessees, lessors, lienholders, professionals, and shareholders to current and former AP clients in matters unrelated to the Debtor. BofA is a current and former AP client in matters unrelated to the Debtor. A current employee of AP who is an attorney in AP’s Legal Department was previously employed by a law firm where BofA was a primary client. BofA is a former employer of current AP employees. BofA is a vendor to AP.
- Barnes & Thornburg, LLP, a professional for certain non-debtor parties-in-interest in this bankruptcy matter, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Barnes & Thornburg is a current and former AP client in matters unrelated to the Debtor.
- Bates White LLC, a proposed professional to the Debtor, is a professional to current AP clients in matters unrelated to the Debtor.
- Barrasso Usdin Kupperman, an ordinary course professional to the Debtor, is a professional and opposing counsel to former AP clients in matters unrelated to the Debtor.
- BASF Catalysts, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“BASF”) are litigation parties, adverse litigation parties, and lessors to current AP clients in matters unrelated to the Debtor. BASF is a current and former AP client in matters unrelated to the Debtor. BASF is a former employer of a current AP employee.
- Bausch Health Companies, Inc., a material potentially indemnified party to the Debtor, and affiliates, are adverse litigation parties to a current AP client in matters unrelated to the Debtor.
- Beasley Allen Law Firm, a law firm with significant representation of talc claimants, is opposing counsel to current AP clients in matters unrelated to the Debtor.

- Blank Rome LLP (“Blank Rome”), an ordinary course professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Blank Rome is a former AP client in matters unrelated to the Debtor.
- Borg Warner Morse Tec, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Bristol-Myers Squibb Company (“Bristol-Myers”), a significant co-defendant to the Debtor in talc-related litigation, is an adverse litigation party to a current AP client in matters unrelated to the Debtor. Bristol-Myers is a former employer of current AP employees.
- Butler Snow LLP, an ordinary course professional to the Debtor, is a professional to current and former AP clients in matters unrelated to the Debtor.
- Carrier Corporation (“Carrier”), a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. Carrier is a current and former AP client in matters unrelated to the Debtor. Carrier is a vendor to AP.
- Cassels Brock & Blackwell LLP, an interested party in this bankruptcy matter, is a professional to current and former AP clients in matters unrelated to the Debtor.
- Century Indemnity Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to former AP clients in matters unrelated to the Debtor.
- Chanel, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a former employer of current AP employees.
- Chehardy, Sherman, Williams, Recile & Hayes, an ordinary course professional to the Debtor, is opposing counsel to current AP clients in matters unrelated to the Debtor.
- Chubb, a major surety and insurance provider to the Debtor, and affiliates, are bondholders, litigation parties, adverse litigation parties, investors, lenders, and lessors to current and former AP clients in matters unrelated to the Debtor. Chubb is a current and former AP client in matters unrelated to the Debtor. AP has a group insurance program in place for all U.S. managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from Chubb at group rates. Chubb is an insurance provider to AP.
- Colgate-Palmolive Company, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Colorado, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Connecticut, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, adverse litigation party, and lender to current and former AP clients in matters unrelated to the Debtor.
- Conopco Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.

- Continental Insurance Company, an insurance provider to the Debtor, is a litigation party to a former AP client in matters unrelated to the Debtor.
- Costco Wholesale Corporation, a material potentially indemnified party and significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Costco”) are lessees, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Costco is a current and former AP client in matters unrelated to the Debtor.
- Coty, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Coty”) are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Coty is a current and former AP client in matters unrelated to the Debtor.
- Crane Co., a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Crane”) are litigation parties, adverse litigation parties, and subsidiaries to current and former AP clients in matters unrelated to the Debtor. Crane is a current and former AP client in matters unrelated to the Debtor.
- Cravath, Swaine & Moore (“Cravath”), a professional for certain non-debtor parties-in-interest in this bankruptcy matter, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Cravath is a current and former AP client in matters unrelated to the Debtor.
- CVS Health Corporation and CVS Pharmacy, Inc., significant co-defendants to the Debtor in talc-related litigation, and affiliates (“CVS”) are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. CVS is a current and former AP client in matters unrelated to the Debtor. CVS is a former employer of current AP employees. CVS is an employee benefits provider to AP.
- Cyprus Amax Minerals Company, Cyprus Mines Corporation, and Cyprus Talc Corp., significant co-defendants to the Debtor in talc-related litigation and key parties in Imerys Talc America, Inc. and Cyprus Mines Corp., and affiliates (“Cyprus”) are litigation parties and adverse litigation parties to current AP clients in matters unrelated to the Debtor.
- Dana Companies, LLC, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- DAP Products, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Davis Hatley Haffeman & Tighe, an ordinary course professional to the Debtor, is a professional and counsel to current AP clients in matters unrelated to the Debtor.
- Dechert LLP (“Dechert”), an ordinary course professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Dechert is a former employer of a current AP employee.
- Delaware, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Dollar General Corporation, a significant co-defendant to the Debtor in talc-related litigation, is an adverse litigation party to a former AP client in matters unrelated to the Debtor.

- Duane Reade Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a former AP client in matters unrelated to the Debtor.
- Eaton Corporation (“Eaton”), a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. Eaton was a member of the official committee of unsecured creditors that retained AP in The NORDAM Group, Inc., a former bankruptcy matter unrelated to the Debtor. Eaton is a current and former AP client in matters unrelated to the Debtor.
- Eli Lilly and Company (“Eli Lilly”), a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and affiliate to current and former AP clients in matters unrelated to the Debtor. Eli Lilly is a current AP client in matters unrelated to the Debtor.
- Employers Mutual Casualty Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Ernst & Young Inc., an interested party in this bankruptcy matter, and affiliates (“E&Y”) are adverse litigation parties, director-affiliated companies, professionals, and shareholders to current and former AP clients in matters unrelated to the Debtor. E&Y is a current and former AP client in matters unrelated to the Debtor. E&Y is a former employer of current AP employees. E&Y is a tax advisor to AP.
- Everest Reinsurance Company, an insurance provider to the Debtor, and affiliates (“Everest”) are litigation parties and adverse litigation parties to current AP clients in matters unrelated to the Debtor. Everest is an insurance provider to AP.
- Faegre Drinker Biddle & Reath LLP (“Faegre”), an ordinary course professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Faegre is a former AP client in matters unrelated to the Debtor. Faegre is a legal services provider to AP.
- Family Dollar Stores Inc., a significant co-defendant to the Debtor in talc-related litigation, is a lessor to a current AP client in matters unrelated to the Debtor.
- Ferrer, Poirot & Wansbrough, a PSA party to the Debtor and a law firm with significant representation of talc claimants, is opposing counsel to current AP clients in matters unrelated to the Debtor.
- Fireman’s Fund Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- First State Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Florida, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Flowserve US, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Flowserve”) are lenders, lessors, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Flowserve is a current and former AP client in matters unrelated to the Debtor.

- FMC Corporation, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Ford Motor Company, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Ford”) are director-affiliated companies, litigation parties, and parent companies to current and former AP clients in matters unrelated to the Debtor. Ford is a current and former AP client in matters unrelated to the Debtor. Ford is a former employer of current AP employees.
- Foster-Wheeler, LLC, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Foster Wheeler”) are litigation parties, adverse litigation parties, lessors, and professionals to current and former AP clients in matters unrelated to the Debtor.
- Gardner Denver, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a professional, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- General Electric Company, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“GE”) are related parties, director-affiliated companies, bondholders, litigation parties, adverse litigation parties, joint venture entities, lenders, lessors, lienholders, parent companies, and shareholders to current and former AP clients in matters unrelated to the Debtor. GE is a current and former AP client in matters unrelated to the Debtor. GE is a former employer of current AP employees. GE and AP are parties to an accounts receivable factoring arrangement whereby AP’s invoices to GE are sold to a third party in a way that improves payment terms to AP in exchange for an invoice discount.
- Genuine Parts Company (“GPC”), a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. GPC is a former AP client in matters unrelated to the Debtor.
- Georgia, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, lender, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Gibraltar Casualty Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Gibson, Dunn & Crutcher LLP (“Gibson”), an ordinary course professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Gibson is a current and former AP client in matters unrelated to the Debtor. Gibson is a former legal services provider to AP.
- Goodyear Tire & Rubber Co., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Goulds Pumps, LLC, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Granite State Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.

- Great American, an insurance provider to the Debtor, is a professional, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. Great American is a former AP client in matters unrelated to the Debtor. Great American is an insurance provider to AP.
- Great Northern Insurance Company (“Great Northern”), an insurance provider to the Debtor, is an adverse litigation party to a current AP client in matters unrelated to the Debtor. Great Northern is an insurance provider to AP.
- Grinnell LLC, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Hanna & Reber, LLP, an ordinary course professional to the Debtor, is a professional and counsel to current AP clients in matters unrelated to the Debtor.
- Harbor Insurance Company, an insurance provider to the Debtor, is a litigation party to a former AP client in matters unrelated to the Debtor.
- Hartford Accident and Indemnity Company, an insurance provider to the Debtor, and affiliates (“Hartford”) are bondholders, litigation parties, adverse litigation parties, and lienholders to current and former AP clients in matters unrelated to the Debtor. Hartford is a current and former AP client in matters unrelated to the Debtor. Hartford is an insurance provider to AP.
- Hartline Barger, an ordinary course professional to the Debtor, is professional and counsel to current and former AP clients in matters unrelated to the Debtor.
- Hawaii, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and litigation party to current and former AP clients in matters unrelated to the Debtor.
- Honeywell International, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Honeywell”) are litigation parties, adverse litigation parties, and lenders to current and former AP clients in matters unrelated to the Debtor. Honeywell is a current and former AP client in matters unrelated to the Debtor. Honeywell is a former employer of a current AP employee.
- Idaho, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Illinois, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Imerys Talc America, Inc., a significant co-defendant to the Debtor in talc-related litigation and a material potentially indemnified party to the Debtor, is a litigation party to a current AP client in matters unrelated to the Debtor.
- IMO Industries Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.



- Indemnity Insurance Company of North America (“Indemnity”), an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. Indemnity is a current AP client in matters unrelated to the Debtor.
- International Insurance Company, an insurance provider to the Debtor, and affiliates, are adverse litigation parties to a current AP client in matters unrelated to the Debtor.
- International Surplus Lines Insurance Company, an insurance provider to the Debtor, is a litigation party to a former AP client in matters unrelated to the Debtor.
- Iowa, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, adverse litigation party, and lender to current and former AP clients in matters unrelated to the Debtor.
- John Crane, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“John Crane”) are litigation parties, adverse litigation parties, and professionals to current and former AP clients in matters unrelated to the Debtor.
- Johnson & Bell Ltd., an ordinary course professional to the Debtor, is a professional to a former AP client in matters unrelated to the Debtor.
- Johnson & Johnson, Johnson & Johnson - Societa' Per Azioni, Johnson & Johnson (Angola), Limitada, Johnson & Johnson (China) Investment Ltd., Johnson & Johnson (Egypt) S.A.E., Johnson & Johnson (Hong Kong) Limited, Johnson & Johnson (Ireland) Limited, Johnson & Johnson (Jamaica) Limited, Johnson & Johnson (Kenya) Limited, Johnson & Johnson (Middle East) Inc., Johnson & Johnson (Mozambique), Limitada, Johnson & Johnson (Namibia) (Proprietary) Limited, Johnson & Johnson (New Zealand) Limited, Johnson & Johnson (Philippines), Inc., Johnson & Johnson (Private) Limited, Johnson & Johnson (Thailand) Ltd., Johnson & Johnson (Trinidad) Limited, Johnson & Johnson (Vietnam) Co., Ltd, Johnson & Johnson AB, Johnson & Johnson AG, Johnson & Johnson Belgium Finance Company BV, Johnson & Johnson Bulgaria EOOD, Johnson & Johnson China Ltd., Johnson & Johnson Consumer (Hong Kong) Limited, Johnson & Johnson Consumer B.V., Johnson & Johnson Consumer Holdings France, Johnson & Johnson Consumer Inc., Johnson & Johnson Consumer NV, Johnson & Johnson Consumer Saudi Arabia Limited, Johnson & Johnson Consumer Services EAME Ltd., Johnson & Johnson Consumer (Thailand) Limited, Johnson & Johnson d.o.o., Johnson & Johnson de Argentina S.A.C. e. I., Johnson & Johnson de Chile Limitada, Johnson & Johnson de Chile S.A., Johnson & Johnson de Colombia S.A., Johnson & Johnson de Costa Rica, S.A., Johnson & Johnson de Mexico, S.A. de C.V., Johnson & Johnson de Uruguay S.A., Johnson & Johnson de Venezuela, S.A., Johnson & Johnson del Ecuador, S.A., Johnson & Johnson Del Paraguay, S.A., Johnson & Johnson del Peru S.A., Johnson & Johnson do Brasil Industria E Comercio de Produtos Para Saude Ltda., Johnson & Johnson Dominicana, S.A.S., Johnson & Johnson Enterprise Innovation Inc., Johnson & Johnson European Treasury Company, Johnson & Johnson Finance Corporation, Johnson & Johnson Finance Limited, Johnson & Johnson Financial Services GmbH, Johnson & Johnson for Export and Import LLC, Johnson & Johnson Foundation Scotland (NON-PROFIT), Johnson & Johnson Gateway, LLC, Johnson & Johnson Gesellschaft m.b.H., Johnson & Johnson GmbH, Johnson & Johnson Guatemala, S.A., Johnson & Johnson Health and Wellness Solutions, Inc., Johnson & Johnson Health Care Systems Inc., Johnson & Johnson Hellas Commercial and Industrial S.A., Johnson & Johnson Hellas Consumer Products Commercial Societe Anonyme, Johnson & Johnson Hemisferica S.A., Johnson & Johnson Holding GmbH, Johnson & Johnson Holdings K.K., Johnson & Johnson Inc., Johnson & Johnson Industrial Ltda., Johnson & Johnson Innovation - JJDC, Inc., Johnson & Johnson Innovation Limited, Johnson & Johnson Innovation LLC, Johnson & Johnson International, Johnson & Johnson International Financial Services Company, Johnson & Johnson International (Singapore) Pte. Ltd., Johnson & Johnson Japan Inc.,

Johnson & Johnson K.K., Johnson & Johnson Kft., Johnson & Johnson Korea Ltd., Johnson & Johnson Korea Selling & Distribution LLC, Johnson & Johnson Limitada, Johnson & Johnson Limited, Johnson & Johnson LLC, Johnson & Johnson Luxembourg Finance Company Sarl, Johnson & Johnson Management Limited, Johnson & Johnson Medical Saudi Arabia Limited, Johnson & Johnson Medical (China) Ltd., Johnson & Johnson Medical (Shanghai) Ltd., Johnson & Johnson Medical (Suzhou) Ltd., Johnson & Johnson Medical B.V., Johnson & Johnson Medical Devices & Diagnostics Group - Latin America, L.L.C., Johnson & Johnson Medical GmbH, Johnson & Johnson Medical Korea Ltd., Johnson & Johnson Medical Limited, Johnson & Johnson Medical Mexico, S.A. de C.V., Johnson & Johnson Medical NV, Johnson & Johnson Medical Products GmbH, Johnson & Johnson Medical Proprietary) Ltd, Johnson & Johnson Medical Pty Ltd, Johnson & Johnson Medical S.A., Johnson & Johnson Medical S.p.A., Johnson & Johnson Medical SAS, Johnson & Johnson Medical Servicios Profesionales S. de R.L. de C.V., Johnson & Johnson Medical Taiwan Ltd., Johnson & Johnson Medical, S.C.S., Johnson & Johnson Medikal Sanayi ve Ticaret Limited Sirketi, Johnson & Johnson Middle East FZ-LLC, Johnson & Johnson Morocco Societe Anonyme, Johnson & Johnson Nordic AB, Johnson & Johnson Pacific Pty Limited, Johnson & Johnson Pakistan (Private) Limited, Johnson & Johnson Panama, S.A., Johnson & Johnson Personal Care (Chile) S.A., Johnson & Johnson Poland Sp. z o.o., Johnson & Johnson Private Limited, Johnson & Johnson Pte. Ltd., Johnson & Johnson Pty. Limited, Johnson & Johnson Research Pty Ltd, Johnson & Johnson Romania S.R.L., Johnson & Johnson S.E. d.o.o., Johnson & Johnson S.E., Inc., Johnson & Johnson Sante Beaute France, Johnson & Johnson SDN. BHD., Johnson & Johnson Services, Inc., Johnson & Johnson Services, Inc., Johnson & Johnson Servicios Corporativos, S. de R.L. de C.V., Johnson & Johnson Surgical Vision India Private Limited, Johnson & Johnson Surgical Vision, Inc., Johnson & Johnson Taiwan Ltd., Johnson & Johnson UK Treasury Company Limited, Johnson & Johnson Ukraine LLC, Johnson & Johnson Urban Renewal Associates, Johnson & Johnson Vision Care Ireland Unlimited Company, Johnson & Johnson Vision Care (Shanghai) Ltd., Johnson & Johnson Vision Care, Inc., Johnson & Johnson, S.A., Johnson & Johnson, S.A. de C.V., Johnson & Johnson, s.r.o., Johnson & Johnson, s.r.o., PT. Johnson & Johnson Indonesia, Shanghai Johnson & Johnson Ltd., Shanghai Johnson & Johnson Pharmaceuticals Ltd., Johnson and Johnson (Proprietary) Limited, Johnson and Johnson Consumer Inc. and Johnson and Johnson Sihhi Malzeme Sanayi Ve Ticaret Limited Sirketi, non-debtor affiliates, equity owners, and parties in interest to the Debtor, and affiliates (“J&J”) are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. J&J is a former employer of current AP employees. An AP employee who works in the AP legal department and performs services on this matter has a son who is employed in the tax department of an affiliate of the Debtor. An AP Managing Director has been identified as a preferred consultant by J&J in matters unrelated to the Debtor, but is not currently performing any work for J&J. AP previously performed services for J&J in China and Korea, which engagements all concluded at least two years ago. In addition, these engagements were for matters wholly unrelated to this Chapter 11 Case and the 2021 Chapter 11 Case. Examples of the types of services performed by AP for J&J in China and Korea include forensic accounting and electronic data hosting services. Additionally, AP has been identified as a “preferred vendor” to J&J for FCPA work. AP has not performed in the past and is not currently providing any services under this arrangement. In the event that AP is considered for any such work, AP would be subject to a competitive process to be engaged and, if engaged, would file a supplemental disclosure in this Chapter 11 Case. For the avoidance of any doubt, AP is not retained to represent J&J’s interests in this Chapter 11 Case and, to that end, J&J has hired its own professional advisors.

- Johnson Law Group, a PSA party and law firm with significant representation of talc claimants, is opposing counsel to a current AP client in matters unrelated to the Debtor.
- K & B Louisiana Corporation, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.

- Kaiser Gypsum Company, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Kansas, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Kelley Jasons McGowan Spinelli, an ordinary course professional to the Debtor, is a professional and counsel to current AP clients in matters unrelated to the Debtor.
- Kentucky, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Kirkland & Ellis ("Kirkland"), an ordinary course professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Kirkland is a current and former AP client in matters unrelated to the Debtor.
- Kitch Drutchas Wagner Valitutti & Sherbrook, an ordinary course professional to the Debtor, is a professional to a current AP client in matters unrelated to the Debtor.
- Kmart Corporation, a significant co-defendant to the Debtor in talc-related litigation, and affiliates ("Kmart") are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor.
- Lewis Brisbois Bisgaard & Smith, LLP, an ordinary course professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor.
- Lexington Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Liakos Law, APC, a PSA party in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtor.
- Liberty Mutual Insurance Company, a major surety to the Debtor, and affiliates ("LiMu") are litigation parties, adverse litigation parties, and lenders to current and former AP clients in matters unrelated to the Debtor. LiMu is a current and former AP client in matters unrelated to the Debtor. LiMu is an insurance provider to AP.
- Longs Drug Stores California, a significant co-defendant to the Debtor in talc-related litigation, and affiliates, are litigation parties to current AP clients in matters unrelated to the Debtor.
- L'Oreal USA, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates, are current and former AP clients in matters unrelated to the Debtor.
- Lowenstein Sandler ("LS"), a professional to J&J in this Chapter 11 Case, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. LS is a current and former AP client in matters unrelated to the Debtor. One of LS's attorneys who is working on this matter cohabitates with and is in a personal relationship with an AP employee. That AP employee is not performing services in this Chapter 11 Case. At the request of the U.S. Trustee, effective on December 10, 2021, AlixPartners implemented an ethical wall to prevent information from passing to its employee concerning any information involving this case.

- Luzenac America, Inc., a material potentially indemnified party to the Debtor and key party in *Imerys Talc America, Inc.* and *Cyprus Mines Corp.*, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Macy's, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. Macy's is a former AP client in matters unrelated to the Debtor. Macy's is a former employer of current AP employees.
- Maine, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and litigation party to current and former AP clients in matters unrelated to the Debtor.
- Manning Gross & Massenburg LLP, an ordinary course professional to the Debtor, is a professional to current and former AP clients in matters unrelated to the Debtor.
- Mary Kay Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a former AP client in matters unrelated to the Debtor.
- Maryland, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and litigation party to current and former AP clients in matters unrelated to the Debtor.
- Massachusetts, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, adverse litigation party, and lender to current and former AP clients in matters unrelated to the Debtor.
- McCarter & English, LLP, a proposed professional to the Debtor, is a professional and opposing counsel to current and former AP clients in matters unrelated to the Debtor.
- McDonald Worley, a PSA party and law firm with significant representation of talc claimants, is opposing counsel to a current AP client in matters unrelated to the Debtor.
- Metropolitan Life Insurance Company, a significant co-defendant to the Debtor in talc-related litigation, and affiliates ("MetLife") are bondholders, litigation parties, adverse litigation parties, lenders, lessors, lienholders, and shareholders to current and former AP clients in matters unrelated to the Debtor. MetLife is a former AP client in matters unrelated to the Debtor. MetLife is an employee benefits provider to AP.
- Michigan, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Midland Insurance Company, an insurance provider to the Debtor, and affiliates, are lienholders and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor.
- Miles & Stockbridge, an ordinary course professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor.
- Miller Firm, LLC, a law firm with significant representation of talc claimants, and affiliates ("Miller") are professionals, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Miller is a former AP client in matters unrelated to the Debtor.

- Minnesota, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, adverse litigation party, and lender to current and former AP clients in matters unrelated to the Debtor.
- Mississippi, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, adverse litigation party, and lessor to current and former AP clients in matters unrelated to the Debtor.
- Montana, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Morgan Lewis, an ordinary course professional to the Debtor, is a professional, counsel, opposing counsel, and director-affiliated company to current and former AP clients in matters unrelated to the Debtor. Morgan Lewis is a current and former AP client in matters unrelated to the Debtor.
- Munich Reinsurance America, Inc., an insurance provider to the Debtor, and affiliates (“Munich Re”) are parent companies, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Munich Re is a former employer of a current AP employee.
- Nachawati Law Group, a PSA party and law firm with significant representation of talc claimants, is opposing counsel to current and former AP clients in matters unrelated to the Debtor.
- Napoli Shkolnik, a law firm with significant representation of talc claimants, is a professional and opposing counsel to current AP clients in matters unrelated to the Debtor.
- National Casualty Company, an insurance provider to the Debtor, and affiliates (“National Casualty”) are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. National Casualty is an insurance provider to AP.
- National Union Fire Insurance Company of Pittsburgh, PA, an insurance provider to the Debtor, is a bondholder, litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Nationwide, an insurance provider to the Debtor, and affiliates, are associated companies, bondholders, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Nationwide is a former employer of current AP employees. Nationwide is an insurance provider to AP.
- Nebraska, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Nelson Mullins Riley & Scarborough, LLP, an ordinary course professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor.
- Nevada, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, lender, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.

- New Hampshire, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- New Hampshire Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- New Jersey, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, lender, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- New Mexico, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, adverse litigation party, lender, and lessor to current and former AP clients in matters unrelated to the Debtor.
- New York, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- North Carolina, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, lender, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- North Dakota, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- North River Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Northbrook Excess and Surplus Insurance Company, an insurance provider to the Debtor, and affiliates, are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor.
- Ohio, a state with consumer protection investigations/actions in this bankruptcy matter, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Oklahoma, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- OnderLaw, LLC, a PSA party and law firm with significant representation of talc claimants, is opposing counsel to a current AP client in matters unrelated to the Debtor.
- Oregon, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, adverse litigation party, lender, and lienholder to current and former AP clients in matters unrelated to the Debtor.
- Orrick, a proposed professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Orrick is a current AP client in matters unrelated to the Debtor.

- Patterson Belknap Webb & Tyler LLP (“Patterson”), an ordinary course professional to the Debtor, is counsel to current and former AP clients in matters unrelated to the Debtor. Patterson is a former AP client in matters unrelated to the Debtor.
- Personal Care Products Council, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Pfizer, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a related party, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor. Pfizer is a former AP client in matters unrelated to the Debtor. Pfizer is a former employer of a current AP employee.
- Pneumo Abex, LLC, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- ProSight, an insurance provider to the Debtor, is an insurance provider to AP.
- Proskauer Rose LLP (“Proskauer”), an ordinary course professional to the Debtor, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Proskauer is a former AP client in matters unrelated to the Debtor. Proskauer is a current legal services provider to AP.
- Publix Super Markets, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates, are litigation parties, adverse litigation parties, and lessors to current and former AP clients in matters unrelated to the Debtor.
- Pulaski Kherkher PLLC, a PSA party and law firm with significant representation of talc claimants, is opposing counsel to a current AP client in matters unrelated to the Debtor.
- Puritan Insurance Company, an insurance provider to the Debtor, is a litigation party to a former AP client in matters unrelated to the Debtor.
- R.T. Vanderbilt Holding Company, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Randi S. Ellis, the proposed Future Talc Claimants’ Representative in this bankruptcy matter, is a professional to a current AP client in matters unrelated to the Debtor.
- Revlon Consumer Products Corporation and Revlon, Inc. (“Revlon”), significant co-defendants to the Debtor in talc-related litigation, are associated companies and litigation parties to current AP clients in matters unrelated to the Debtor. Revlon is a former AP client in matters unrelated to the Debtor.
- Rhode Island, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Rio Tinto America, Inc., a material potentially indemnified party to the Debtor, and affiliates, are current and former AP clients in matters unrelated to the Debtor.

- Robinson Calcagnie, a law firm with significant representation of talc claimants, is opposing counsel to current and former AP clients in matters unrelated to the Debtor.
- Roger Frankel, a key party in *Imerys Talc America, Inc.* and *Cyprus Mines Corp.*, is opposing counsel to a current AP client in matters unrelated to the Debtor.
- Royal Indemnity Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to former AP clients in matters unrelated to the Debtor.
- Rite Aid Corporation, a significant co-defendant to the Debtor in talc-related litigation, and affiliates, are litigation parties, adverse litigation parties, and lessors to current and former AP clients in matters unrelated to the Debtor.
- Safety National Casualty Corporation, an insurance provider to the Debtor, is a bondholder, lienholder, lender, adverse litigation party, and shareholder to current and former AP clients in matters unrelated to the Debtor.
- Safeway, Inc., a significant co-defendant to the Debtor in talc-related litigation and a material potentially indemnified party to the Debtor, and affiliates, are related parties, litigation parties, adverse litigation parties, and lessees to current and former AP clients in matters unrelated to the Debtor.
- Sanders, Phillips, Grossman, LLC, a law firm with significant representation of talc claimants, is opposing counsel to current AP clients in matters unrelated to the Debtor.
- Sanofi-Aventis U.S. LLC, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Sanofi-Aventis”) are investors, litigation parties, and adverse litigation parties to current AP clients in matters unrelated to the Debtor. Sanofi-Aventis is a current and former AP client in matters unrelated to the Debtor.
- Schwabe Williamson & Wyatt, an ordinary course professional to the Debtor, is a professional to a current AP client in matters unrelated to the Debtor.
- Seeger Weiss LLP, a PSA party and law firm with significant representation of talc claimants, is opposing counsel to current AP clients in matters unrelated to the Debtor.
- Sentry Insurance, an insurance provider to the Debtor, and affiliates, are lenders, adverse litigation parties, limited partners, and shareholders to current and former AP clients in matters unrelated to the Debtor.
- Shook, Hardy & Bacon L.L.P., a proposed professional to the Debtor, is a professional to current and former AP clients in matters unrelated to the Debtor.
- Shulton, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Sills Cummis & Gross P.C. (“Sills”), an ordinary course professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Sills is a former AP client in matters unrelated to the Debtor.
- Skadden, Arps, Slate, Meagher & Flom LLP (“Skadden”), a proposed professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor.



Skadden is a former AP client in matters unrelated to the Debtor. Skadden is a former employer of current AP employees. Skadden is a former legal services provider to AP.

- Slater Slater Schulman LLP, a PSA party and law firm with significant representation of talc claimants, is a professional and opposing counsel to current AP clients in matters unrelated to the Debtor.
- South Dakota, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Starr Indemnity & Liability Company, an insurance provider to the Debtor, and affiliates (“Starr”) are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Starr is a current and former AP client in matters unrelated to the Debtor. Starr is an insurance provider to AP.
- Stoel Rives LLP, an ordinary course professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor.
- Swartz Campbell LLC, an ordinary course professional to the Debtor, is a professional to current AP clients in matters unrelated to the Debtor.
- Target Corporation, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Target”) are litigation parties, adverse litigation parties, and lessors to current and former AP clients in matters unrelated to the Debtor. Target is a current and former AP client in matters unrelated to the Debtor.
- Texas, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- The Dow Chemical Company, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Dow”) are bondholders, related parties, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Dow is a current AP client in matters unrelated to the Debtor. Dow is a former employer of current AP employees.
- The Estee Lauder Companies, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates, are adverse litigation parties to a former AP client in matters unrelated to the Debtor.
- The Kroger Co., a significant co-defendant to the Debtor in talc-related litigation and affiliates (“Kroger”) are litigation parties, adverse litigation parties, and shareholders to current and former AP clients in matters unrelated to the Debtor. Kroger is a former employer of a current AP employee.
- The Procter & Gamble Company, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Procter & Gamble”) are litigation parties to a current AP client in matters unrelated to the Debtor. Procter & Gamble is a former employer of current AP employees.
- Thrifty Payless, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.

- TIG Insurance Company, an insurance provider to the Debtor, is a litigation party and adverse litigation party to former AP clients in matters unrelated to the Debtor.
- Trammell PC, a PSA party and law firm with significant representation of talc claimants, is a lessor to a current AP client in matters unrelated to the Debtor.
- Transamerica Premier Insurance Company, an insurance provider to the Debtor, and affiliates, are adverse litigation parties and lessors to former AP clients in matters unrelated to the Debtor.
- Travelers Casualty and Surety Company and Travelers Casualty and Surety Company of America, insurance providers and major sureties to the Debtor, and affiliates (“Travelers”) are bondholders, litigation parties, adverse litigation parties, lessors, limited partners, and professionals to current and former AP clients in matters unrelated to the Debtor. Travelers is a current AP client in matters unrelated to the Debtor. Travelers is an insurance provider to AP.
- Tucker Ellis LLP, an ordinary course professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor.
- Unilever Home & Personal Care USA, a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Unilever”) are related parties and litigation parties to current and former AP clients in matters unrelated to the Debtor. Unilever is a former employer of current AP employees.
- Union Carbide Corporation, a significant co-defendant to the Debtor in talc-related litigation, and affiliates, are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor.
- Utah, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Valeant Pharmaceuticals International, Inc., a material potentially indemnified party to the Debtor, and affiliates, are related parties, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor.
- Vanderbilt Minerals, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Vermont, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- ViacomCBS, Inc., a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Viacom”) are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. Viacom is a current and former AP client in matters unrelated to the Debtor. Viacom is a former employer of a current AP employee.
- Virginia, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, adverse litigation party, and litigation party to current and former AP clients in matters unrelated to the Debtor.

- Wagstaff Law Firm, a law firm with significant representation of talc claimants, is opposing counsel to current AP clients in matters unrelated to the Debtor.
- Walgreen Co., a significant co-defendant to the Debtor in talc-related litigation, and affiliates (“Walgreen”) are litigation parties, adverse litigation parties, and lessors to current and former AP clients in matters unrelated to the Debtor. Walgreen is a former employer of current AP employees.
- Walmart, Inc., a significant co-defendant to the Debtor in talc-related litigation and a material potentially indemnified party to the Debtor, and affiliates (“Walmart”) are bondholders, litigation parties, adverse litigation parties and lessors to current and former AP clients in matters unrelated to the Debtor. Walmart is a current and former AP client in matters unrelated to the Debtor. Walmart is a former employer of current AP employees.
- Walsh Pizzi O’Reilly Falanga LLP, a professional to the proposed Future Talc Claimants’ Representative in this bankruptcy matter, is a professional and counsel to current AP clients in matters unrelated to the Debtor.
- Warren Pumps, LLC, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Washington, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, adverse litigation party, lender, and shareholder to current and former AP clients in matters unrelated to the Debtor.
- Washington, D.C., a federal district with consumer protection investigations/actions in this bankruptcy matter, is the location of an AP office.
- Watts Guerra LLP, a PSA party and law firm with significant representation of talc claimants, is a professional and opposing counsel to current and former AP clients in matters unrelated to the Debtor. Watts Guerra LLP is a current AP client in matters unrelated to the Debtor.
- Weil, Gotshal & Manges LLP (“Weil”), a proposed professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Weil is a current and former AP client in matters unrelated to the Debtor. The father of a current AP employee is the co-chair of the restructuring department at Weil and a member of Weil’s management committee. Weil is a current legal services provider to AP.
- Wellfleet New York Insurance Company, an insurance provider to the Debtor, and affiliates, are lenders and professionals to current and former AP clients in matters unrelated to the Debtor.
- West Virginia, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Westchester Fire Insurance Company, an insurance provider to the Debtor, and affiliates (“Westchester”) are bondholders, litigation parties, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtor. AP has a group insurance program in place for all U.S. managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from an affiliate of Westchester at group rates.

- Westport Insurance Corporation, an insurance provider to the Debtor, is a litigation party and adverse litigation party to former AP clients in matters unrelated to the Debtor.
- White & Case LLP, a professional for certain non-debtor parties in interest in this bankruptcy matter, is a professional, counsel, and opposing counsel to current and former AP clients in matters unrelated to the Debtor. White & Case LLP is a former AP client in matters unrelated to the Debtor. White & Case LLP is a former employer of current AP employees.
- Whittaker Clark & Daniels, Inc., a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Windsor Minerals Inc., a material potentially indemnified party to the Debtor, is a litigation party to a current AP client in matters unrelated to the Debtor.
- Wisconsin, a state with consumer protection investigations/actions in this bankruptcy matter, is a bondholder, litigation party, and adverse litigation party to current and former AP clients in matters unrelated to the Debtor.
- Wollmuth Maher & Deutsch LLP (“Wollmuth”), a proposed professional to the Debtor, is a professional and counsel to current and former AP clients in matters unrelated to the Debtor. Wollmuth is a former AP client in matters unrelated to the Debtor.
- Wyeth Holdings LLC, a significant co-defendant to the Debtor in talc-related litigation, is a litigation party to a current AP client in matters unrelated to the Debtor.
- XL Insurance Company, an insurance provider to the Debtor, and affiliates (“XL”) are bondholders, litigation parties, adverse litigation parties, and lessors to current and former AP clients in matters unrelated to the Debtor. XL is an insurance provider to AP.